G 18/Final

GARNET RESOURCE AREA

RESOURCE MANAGEMENT PLAN/ ENVIRONMENTAL IMPACT STATEMENT

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Butte District, Montana

September 1985

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U.S. Department of the Interior
Bureau of Land Management

FINAL

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BLM-MT-ES-85-009-4410

As the Nation's principal conservation agency, the Department of the Interior has responsibility for most of our nationally owned public lands and natural resources. This includes fostering the wisest use of our land and water resources, protecting our fish and wildlife, preserving the environmental and cultural values of our national parks and historical places, and providing for the enjoyment of life through outdoor recreation. The Department assesses our energy and mineral resources and works to assure that their development is in the best interests of all our people. The Department also has a major responsibility for American Indian reservation communities and for people who live in Island Territories under U.S. administration.

IN REPLY REFER TO:

United States Department of the Interior

BUREAU OF LAND MANAGEMENT

Dear Reader:

The proposed Garnet Resource Area Management Plan and final Environmental Impact Statement is to be used in conjunction with the draft plan and environmental impact statement issued in December 1984. That document described a proposed resource management plan for approximately 145,660 surface acres of public land and 213,385 acres of federal mineral estate administered by the Bureau of Land Management in its Garnet Resource Area and analyzed five alternatives.

Corrections and revisions that should be made to the draft are shown in this document. Comments on the draft that were made at public meetings and by letter are also included, along with the BLM's responses to those comments. Because the changes suggested through the public review process did not require a major rewrite of the draft, the draft statement and its accompanying map supplement are incorporated into this final environmental impact statement by reference. A limited number of copies of the draft and the map supplement are available at the Bureau of Land Management, Butte District Office, P. O. Box 3388, Butte, Montana 59702 and at the Garnet Resource Area Office, 3255 Fort Missoula Road, Missoula, Montana 59801.

This concludes the BLM's evaluation of the proposed plan and alternatives. Issuance of a record of decision and implementation of the plan will occur soon after the conclusion of a 30-day protest period beginning September 28, 1985.

With the exception of the recommendations for Wales Creek, Hoodoo Mountain, and Quigg West wilderness study areas, all parts of this proposed plan may be protested. Protests should be sent to the Director (202), Bureau of Land Management, 1800 C Street N.W., Washington, D.C. 20240, prior to October 27, 1985, which is the end of the 30-day protest period, and should include the following information:

The name, mailing address, telephone number, and interest of the person filing the protest.

A statement of the issue or issues being protested.

A statement of the part or parts of the plan being protested.

A copy of all documents addressing the issue or issues that were submitted during the planning process by the protesting party, or an indication of the date the issue or issues were discussed for the record.

A concise statement explaining why the proposed decision is believed to be wrong.

At the end of the 30-day protest period, the proposed plan, excluding any portion under protest, will become final. Approval will be withheld on any portion of the plan under protest until final action has been completed.

Any significant change to the proposed plan made as a result of a protest will be made available for public review and comment prior to final approval and implementation.

We would like to thank the individuals and organizations whose comments and suggestions have helped us to prepare a plan that will lead to more effective management of public lands. Your interest is appreciated.

Sincerely yours,

Dean E. Stepanek
State Director

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FINAL

RESOURCE MANAGEMENT PLAN
ENVIRONMENTAL IMPACT STATEMENT

For The

GARNET RESOURCE AREA
BUTTE DISTRICT
MONTANA

Prepared By

BUREAU OF LAND MANAGEMENT
DEPARTMENT OF THE INTERIOR

Dean Stepanek

STATE DIRECTOR
MONTANA STATE OFFICE
1985

HOW TO USE THIS DOCUMENT

PUBLIC REVIEW

In the draft Resource Management Plan and Environmental Impact Statement (RMP/EIS), alternative management plans were evaluated, and a preferred plan was selected. The document was sent out for public review between December 1984 and March 1985. The comments that were received helped shape the proposed plan. This document publishes the comments, and details how the comments were integrated into the proposed plan.

Suggestions for Review

The document is organized for several levels of review.

1. If a brief overview of the proposed RMP and final EIS is desired, you should review the Summary. **Substantial changes from the draft are highlighted in bold print.**

2. If a detailed study of the proposed resource management plan is desired, you should review the section entitled Text Changes in the proposed RMP in Chapter 8 of this document as well as the referenced sections of the draft RMP/EIS. The proposed RMP is highlighted with a gray background.

3. If a particular issue is of concern, you should review Chapter 7 in this document to see how the comments addressed the issue. The Responses to Comments and Letters section of Chapter 7 is organized by resource topic.

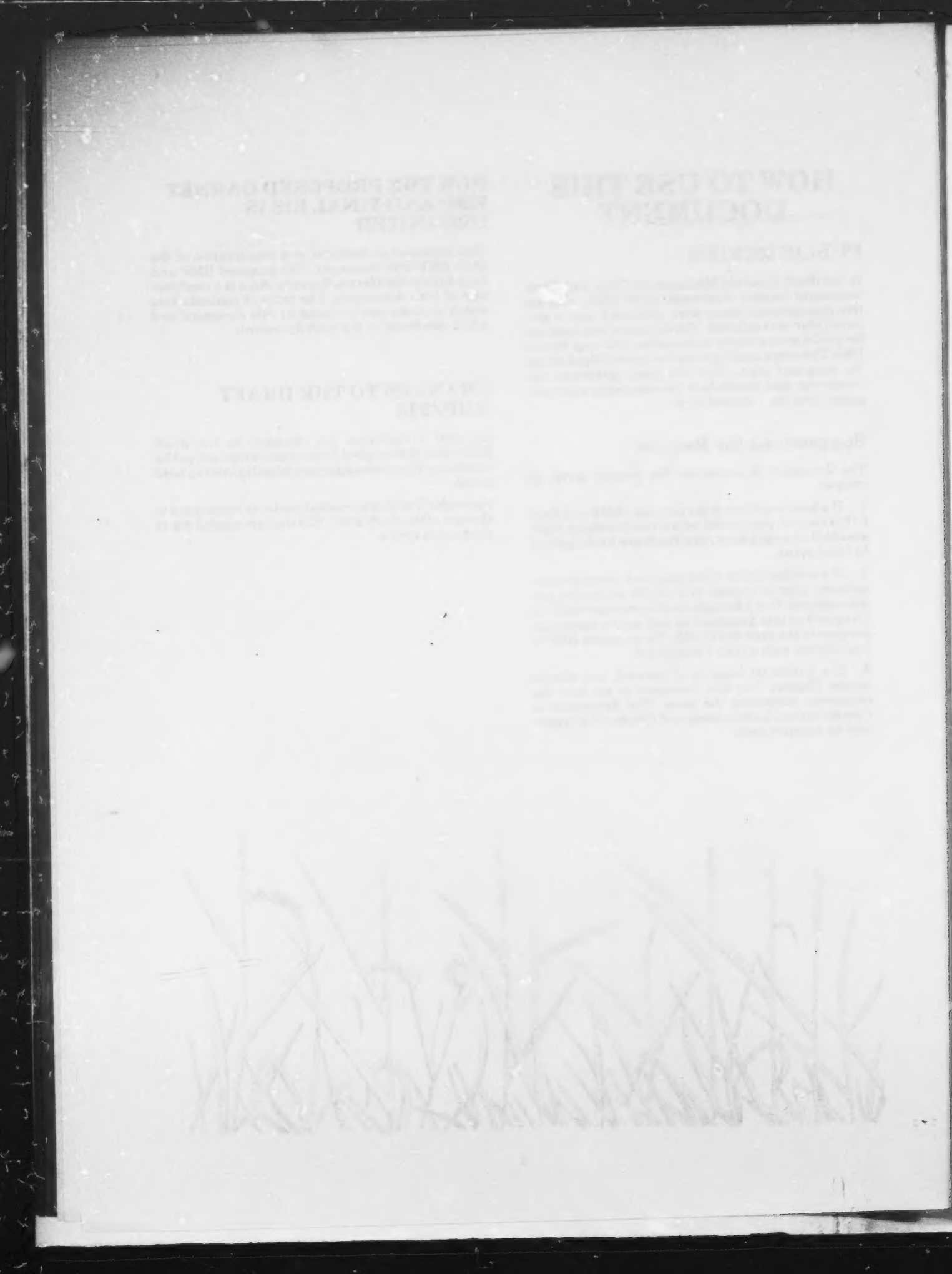
HOW THE PROPOSED GARNET RMP AND FINAL EIS IS ORGANIZED

This document is designed as a continuation of the draft RMP/EIS document. The proposed RMP and final EIS for the Garnet Resource Area is a combination of both documents. The table of contents lists which sections can be found in this document and which are found in the draft document.

CHANGES TO THE DRAFT RMP/EIS

Chapter 8 contains the changes to the draft RMP/EIS that resulted from consultation and public comment. **These changes are highlighted in bold print.**

Appendix T of this document contains corrections to the text of the draft RMP/EIS that are needed due to production errors.



GARNET RESOURCE AREA
PROPOSED RESOURCE MANAGEMENT PLAN
FINAL ENVIRONMENTAL IMPACT STATEMENT
1985

LEAD AGENCY: U. S. Department of the Interior, Bureau of Land Management

TYPE OF ACTION: Administrative

JURISDICTION OF ACTION: Missoula, Granite, and Powell Counties, Montana

ABSTRACT: The draft Resource Management Plan and Environmental Impact Statement (RMP/EIS), which is incorporated into this final EIS by reference, addresses future management options for approximately 145,660 surface acres and 213,385 acres of federal mineral estate administered by the Bureau of Land Management through its Garnet Resource Area office in Missoula, Montana. The plan primarily focuses on resolving key resource management issues. These issues include: renewable resources; nonrenewable resources; special attention resources; land ownership and administration; and cultural, aesthetic, and recreation resources.

Five RMP alternatives are considered in detail in this document, which incorporates by reference much of the material presented in the draft RMP/EIS. Alternative E, the proposed resource management plan, represents a balance between resource production and environmental protection. Alternative A, the no action alternative, is a continuation of present management direction. Alternative B, resource production, represents an emphasis on making public land and resources available for use and development. Alternative C, environmental protection, represents an emphasis on maintaining or improving important environmental values. Alternative D, partial wilderness, represents an emphasis similar to C, with only portions of the wilderness study areas recommended for designation. When the RMP is finalized, it will provide a comprehensive framework for managing and allocating public land during the next ten or more years. The proposed RMP and final EIS will also provide the basis for wilderness recommendations by the Secretary of the Interior regarding final designation by Congress. These recommendations will be incorporated into a wilderness study report and accompanying environmental impact statement. The draft RMP/EIS and its accompanying map supplement should be used in conjunction with this final EIS, which contains modifications and corrections to the draft and the comments received during the public review process.

FOR FURTHER INFORMATION CONTACT: David R. Baker, Project Manager, Garnet Resource Area Office, 3255 Fort Missoula Road, Missoula, Montana 59801; Telephone (406) 329-3914.

SUMMARY

This **proposed** Garnet Resource Management Plan (RMP) and **final** Environmental Impact Statement (EIS) addresses future management options for approximately 145,660 surface acres and 213,385 acres of federal mineral estate administered by the Bureau of Land Management (BLM) through its Garnet Resource Area office in Missoula, Montana. Although the Garnet Resource Area encompasses nine counties in northwestern Montana, BLM administers substantial surface acreage in only three counties—Missoula, Granite, and Powell.

When completed, the Garnet RMP will provide a comprehensive framework for managing public land and allocating resources in the resource area during the next ten or more years. However, this document is primarily focused on five broad issues and the decisions needed to address each issue. The broad issues involve the management of renewable resources, such as timber and livestock forage; special attention resources, including wilderness and wildlife habitat; nonrenewable resources, such as energy and minerals; land ownership and administration, including withdrawals and access; and recreation, cultural, and aesthetic resources.

The **proposed** Garnet RMP and **final** EIS is based on the concept of management areas as developed by the Lolo National Forest Plan (USDA, FS 1982b). First, the capabilities of the land are evaluated in a resource inventory. Then possible management options, appropriate for managing the resources on the land, are developed. (Fourteen different management area prescriptions were developed for the Garnet RMP and are listed in Appendix A of the draft RMP/EIS.) Next, the capabilities of a given area of land is matched with an array of management options; all of the options are compatible with the multiple use management directives of the BLM but give emphasis to different resources. Finally, the management options for all lands are arranged into five alternative management plans. (The management area assignments for each alternative in the **proposed** Garnet RMP are shown on the Alternative maps in the map packet of the draft RMP/EIS.)

Five RMP alternatives are considered in this document. One represents no action, which means a continuation of current management direction. The other four alternatives provide a range of choices from those emphasizing resource protection to those emphasizing resource production.

The proposed Resource Management Plan incorporates portions of the other four alternatives and generally represents a balance between resource production and environmental protection. The management actions, resource allocations, and environmental consequences that characterize each alternative are summarized below.

ALTERNATIVE A

Alternative A is a continuation of present management. It is called the no action alternative because no change in management is proposed.

Approximately 87,920 acres (78 percent) of the Commercial Forest Lands (CFL) will be managed essentially as they are at present. Annual harvest will affect 1,216 acres, yielding 6,370 mbf/year. Approximately 9.6 miles of new road construction will be required annually. The only significant acreages of CFL that will not be available for harvest are set aside areas and active mining sites. Approximately 500 acres of CFL will be subject to restrictive timber management to protect and maintain riparian and watershed values; approximately 22,000 acres will be subject to restrictive timber management to protect or enhance important wildlife values; and approximately 24,000 acres will be set aside to protect or

enhance wildlife, watershed, soils, and recreation values. Forest management activities will be emphasized on 65,500 acres (57 percent) of CFL, subject to Standard Operating Procedures (SOPs) to maintain site productivity and water quality.

The annual harvest will result in 158 acres (13 percent) clearcut, 766 acres (63 percent) shelterwood cut, 49 acres (4 percent) seed tree cut, 207 acres (17 percent) selection cut, and 36 acres (3 percent) commercially thinned. Approximately 100 acres of planting and 40 acres of precommercial thinning will be accomplished annually with appropriated funds. In addition, planting of problem reforestation sites in a timber sale and timber stand improvement work on occasional overstory removal units will be accomplished under the terms of the timber sale contract.

At present ten Allotment Management Plans (AMPs), comprising 35,728 acres, are under intensive grazing management. Authorized livestock grazing will remain at current levels (5,930 AUMs) in the short term. In the long term, livestock forage production is projected to increase 17 percent over current levels. These increased AUMs will be due primarily to the cumulative effect of intensive grazing management systems already in place.

The range improvements required to implement this alternative include about 200 acres of weed control, 22 miles of fence, 7 cattleguards, 25 springs, and 2 miles of pipeline. The estimated initial cost for the proposed improvements is **$181,900. (Text change in response to Comment P.)**

Long-term vegetative trend under this alternative is projected to remain static on 74 leases and show a slight improvement on the 10 existing AMPs. Current projections indicate that approximately 6,633 acres in fair and poor vegetative condition in the existing AMPs will be improved up one condition class to good and fair vegetative condition.

Livestock use affects 48 percent (29 miles) of the aquatic habitat in the resource area, and 21 percent of the aquatic habitat is in suboptimum condition. In the long term, it is estimated that this alternative will improve half of the suboptimum habitat through increased bank stability and cover.

None of the four areas currently under wilderness study will be recommended to Congress for wilderness designation or any other formal designation. No public land in the resource area will be proposed for formal designation.

Under this alternative 1,400 acres will be managed primarily for riparian values. All other riparian habitat will be managed under SOPs to protect watershed values. Approximately 9,500 acres of noncommercial forest land containing important wildlife features will be available primarily for wildlife use. Winter range, land with good summer range potential for elk, and areas with concentrations of habitat features totalling 32,000 acres will be managed to protect or enhance wildlife habitat while allowing for the harvest of timber. In addition, 28,460 acres of largely undeveloped lands, set aside in previous land use plans, will be managed primarily for wildlife values. Cumulative adverse impacts to wildlife habitat due to grazing, timber management, and mineral activities are expected to be moderate. The impacts to wildlife will be mitigated on about 51 percent of the land base.

Under Alternative A, oil and gas leasing will be permitted on 205,586 acres of federal mineral estate (100 percent of the total acreage available for consideration). Oil and gas leasing will be subject to seasonal restrictions on 36,874 acres and to stipulations prohibiting surface occupancy on 33,340 acres. The restricted areas and areas prohibiting surface occupancy consist largely of road closure areas, river tracts, cultural and historical sites, and special management areas. The remaining 135,372 acres will be leased subject to standard stipulations.

Exploration and development for locatable minerals in the resource area will not be significantly affected under this alternative. A total of 1,460 acres will remain or be withdrawn from mineral entry. The areas to be withdrawn are to protect recreation, scientific, and historical sites. Approximately 203,850 acres (99 percent) of federal minerals in the resource area will be available for mineral entry and development.

For purposes of analysis, all public land will be retained in public ownership. In actual practice, some public land could be sold or exchanged as a result of tract-specific land use plan amendments, but the net result will be little or no change in the land ownership pattern.

Public access currently is available to 95 tracts totalling 114,600 acres (78 percent public land base). Administrative access is available to an additional 13 tracts totalling 5,320 acres. Under this alternative additional access will be secured only for timber management.

Approximately 30,060 acres will be identified as avoidance areas for utility corridor development. The remaining 115,600 acres (79 percent) will remain available for further consideration. Public land within avoidance areas generally will not be available for corridor development. Criteria provided in the plan will guide future site-specific decisions regarding corridor development.

Recreation opportunities will not be significantly affected by this alternative as developmental activities are directed away from key recreation areas. Forty undeveloped recreation sites, near water or road closure gates, are identified for protection. Other recreation management is generally the same for all alternatives. This includes maintaining existing and potential walk-in hunting areas, cooperatively managing Garnet Ghost Town, managing the Garnet National Winter Recreation Trail, developing cross-country ski trails, and acquiring access to river tracts. No new outfitters and guides will be licensed for hunting under any alternatives, except in conjunction with adjoining national forest lands. There will be no significant effects on visual quality. Management of cultural or historical sites will be the same

for all alternatives, with interpretation of key sites around Garnet and with all others receiving protective management. There will be a beneficial effect on cultural resources in all alternatives.

Under this alternative and all others, public land will be designated as limited, with all vehicles including Off-road Vehicles (ORVs), restricted to open roads and trails. Exceptions may be made for snowmobile use. Also under all alternatives the need for road closures will be considered on a case-by-case basis. Seasonal closures will be implemented in areas to provide wildlife security, reduce recreation conflicts, reduce road maintenance, provide watershed protection, and enhance recreation, including the opening of private lands for hunting. It is generally the policy that new roads be closed or limited for motorized vehicle use. All existing closures will continue.

Air quality will not be significantly affected. Watershed conditions are expected to remain at the present level. Water quality, which is generally good, should remain at its present level.

This alternative will not have significant social or economic impacts.

ALTERNATIVE B

Alternative B emphasizes resource production.

Forest resources under this alternative will be utilized to the fullest extent possible under the principles of sustained yield management. Approximately 112,000 acres (99 percent) of the CFL will be available for forest management activities. Annual harvest will affect 1,660 acres, yielding 8,560 mbf of timber per year. Approximately 12.9 miles of new road construction will be required annually. The only significant areas of CFL not available for harvest will be active mining sites. No acreage will be set aside or subject to restrictions for other resource values; the 112,000 acres of CFL will be available, without restrictions, for sustained yield management subject to SOPs to maintain site productivity and water quality.

The annual harvest activities will include 216 acres (13 percent) clearcut, 1,050 acres (63 percent) shelterwood cut, 66 acres (4 percent) seed tree cut, 282 acres (17 percent) selection cut, and 50 acres (3 percent) commercially thinned. Intensive management practices will be the same as in Alternative A.

Under this alternative 9,211 AUMs will be allocated to livestock use over the short term. In the long term available AUMs are projected to increase by 2,451. These additional AUMs will be a result of placing 24 allotments (14 more than in Alternative A) under intensive grazing management, improving vegetative conditions, and increasing timber harvest. The greatest increase will be on allotments under intensive grazing management.

Range improvements required to implement this alternative include about 500 acres of weed control, 104 miles of fence, 32 cattleguards, 69 springs, and 4 miles of pipeline. The estimated initial cost for the proposed improvements is **$689,000. (Text change in response to Comment P.)**

Vegetative conditions are projected to improve from fair to good on 11,699 acres and from poor to fair on 1,297 acres in the long term. Significant improvement in vegetative condition can be expected on the 14 proposed AMPs. Conditions on the ten existing AMPs will be similar to those discussed in Alternative A.

Livestock use will affect 62 percent (38 miles) of the aquatic habitat in the resource area; 21 percent of the aquatic habitat is in suboptimum condition. Intensive grazing management is projected to improve all of the suboptimum habitat through increased bank stability and cover.

None of the four areas currently under wilderness study will be recommended to Congress for wilderness designation, nor will any areas be recommended for any other formal designation. In the long term wilderness values generally will be forgone in all areas.

Under this alternative there will be no management primarily for riparian values. All riparian habitat will be managed under SOPs to protect watershed values. Approximately 22,000 acres of noncommercial forest land containing important wildlife features will be available primarily for wildlife use, but there will be no management to protect or enhance wildlife habitat. Cumulative adverse impacts to wildlife habitat are expected to be moderate. These impacts will be mitigated on only 22 percent of the land base. However, intensive grazing management will bring substantial improvement to **the forage segment of** wildlife habitat. **(Text change in response to Comment P.)**

All land available for oil and gas leasing, 205,586 acres, will be leased. There will be no seasonal restrictions on any leases. Stipulations prohibiting surface occupancy will be imposed on 160 acres consisting largely of cultural and historical sites. The remaining 205,426 acres will be leased with standard stipulations.

Exploration and development for locatable minerals in the resource area will not be significantly affected under this alternative. The acres available for mineral entry and the acres to remain or be withdrawn from mineral entry remain the same as in Alternative A.

Under Alternative B, and under all remaining alternatives, the land ownership adjustment issue will be resolved by identification of retention zones in areas where public lands will primarily be retained or enhanced. These retention zones total 126,872 acres. Most are characterized by reasonably consolidated holdings or contain resource values appropriate for public ownership. Public lands outside the retention zones total 18,788 acres. In general, these lands are in small tracts, widely scattered, and often without legal or physical access. They will be considered on their individual merits for retention, exchange, transfer, or

sale. All site-specific decisions regarding land ownership adjustments will be made based on criteria identified in the plan.

Future investments in public facilities and improvements, including land and access acquisition, generally will receive highest priority in retention areas. In this alternative and the remaining alternatives, public access is proposed to an additional 9,500 acres; administrative access is proposed to an additional 8,150 acres. Alternatives B through E will result in overall improvement in the land ownership pattern and in legal access to public land.

Identified avoidance areas for utility corridor development in this alternative will be reduced to 160 acres, protecting historical and cultural sites. This will leave the remaining 145,500 acres available for further consideration. Criteria provided in the plan will guide any future site-specific decisions on corridor development.

Recreation resources and opportunities will be significantly affected by developmental activities under Alternative B, and no undeveloped recreation sites will be identified for protection. Visual impacts could be significant, particularly in areas of high visual sensitivity. Management of cultural and historical sites is the same as in Alternative A.

Road closure proposals and restrictions on vehicle use remain the same as Alternative A.

Air quality will not be significantly affected, although short term impacts will be slightly greater than in Alternative A. Watershed conditions and water quality are expected to improve slightly because of implementation of 14 new AMPs.

The timber harvest level of this alternative will provide 20 additional jobs compared to Alternative A. Increases in ranch income could be significant for some individuals due to increases in authorized livestock use.

ALTERNATIVE C

Alternative C emphasizes environmental protection.

Under this alternative more acres of CFL will be subject to management restrictions, although the CFL acreage available for management is essentially the same as under current management (87,930 acres). There will be about 1,120 acres harvested annually, yielding 5,960 mbf. There will also be 90 miles of road constructed annually. Approximately 2,780 acres of CFL will be set aside or subject to restrictive timber management to protect and maintain riparian and watershed values; approximately 46,700 acres will be subject to restrictive timber management to protect or enhance important wildlife values; and approximately 2,000 acres within special management areas will be set aside to protect or enhance wildlife, watershed, soils, and recreation. The remaining 38,500 acres (33 percent) of CFL will be available for a full range of forest management activities subject to SOPs to maintain site productivity and water quality.

The annual harvest activities on 1,120 acres will include 145 acres (13 percent) clearcut, 706 acres (63 percent) shelterwood cut, 45 acres (4 percent) seed tree cut, 190 acres (17 percent) selection cut, and 34 acres (3 percent) commercially thinned. Intensive timber management practices will be the same as Alternative A.

With 56 percent of the available CFL acreage subject to volume reduction and 22 percent of the CFL unavailable for harvest, the annual harvest will be 5,960 mbf, a significant reduction from the possible harvest level of 8,560 mbf.

Under this alternative 3,595 AUMs, or 65 percent of the current licensed use, will be allocated to livestock grazing in the short term. An increase of 637 AUMs is projected in the long term. These reductions are the result of management goals to protect riparian habitat. Topography in the resource area causes livestock to travel and concentrate in or near the valley bottoms and associated riparian areas. Because of this heavy use, 95 percent of the poor and fair condition range is found in the valley bottoms. This alternative strives to improve riparian habitat conditions primarily by reducing stocking levels.

Range improvements required to implement this alternative include about 82 miles of fence and 22 cattleguards. The estimated initial cost for the proposed improvements is **$332,000. (Text change in response to Comment P.)**

Vegetative conditions are expected to improve significantly on the 28 allotments proposed for intensive management and to remain at or near the same condition on the remaining 56 allotments.

Livestock use affects 48 percent (29 miles) of the aquatic habitat in the resource area; 21 percent of the aquatic habitat is in suboptimum condition. Intensive grazing management is projected to improve all of the suboptimum habitat through increased bank stability and cover.

All four of the areas currently under wilderness study will be recommended to Congress for wilderness designation. As a result wilderness values generally will be maintained on 27,737 acres in the resource area. These areas will be closed to motorized vehicle use.

A unique geologic feature, consisting of 20 acres of an exposed limestone formation, will be recommended as an Area of Critical Environmental Concern (ACEC).

Under this alternative 4,300 acres will be managed primarily for riparian values. All other riparian habitat will be managed under SOPs to protect watershed values. Approximately 5,300 acres of noncommercial forest land containing important wildlife features will be available primarily for wildlife use. Winter range, land with good summer range potential for elk,

and areas with concentrations of habitat features totalling 61,200 acres will be managed to protect or enhance wildlife habitat while allowing for the harvest of timber. Cumulative adverse impacts to wildlife habitat are expected to be low. The impacts to wildlife will be mitigated on about 70 percent of the land base.

Oil and gas leasing will be permitted on 177,849 acres of federal mineral estate (86.5 percent). Oil and gas leasing will be subject to seasonal restrictions on 66,050 acres and to stipulations prohibiting surface occupancy on 2,560 acres. These restricted areas consist largely of road closure areas, river tracts, cultural and historical sites, and the periphery of special management areas. Approximately 27,737 acres will not be leased mainly to meet a Congressional mandate not to lease in WSAs or wilderness (subject to change by Congressional discretion). The remaining 109,239 acres will be leased subject to standard stipulations.

Exploration and development for locatable minerals will be affected by the recommendation of 27,737 acres for wilderness designation. This will increase the total acreage withdrawn from mineral entry to 29,217 acres, 14 percent of the available acres.

Resolution of the land ownership adjustment issue and access proposals will be the same as in Alternative B.

The 27,757 acres recommended for wilderness and for ACEC under this alternative will be excluded from corridor development. Another 12,253 acres will be identified as avoidance areas; public land within avoidance areas generally will not be available for corridor development. The remaining 105,650 acres (76 percent) will be available for further consideration. Criteria provided in the plan will guide future site-specific decisions regarding corridor development.

Most recreational activities will benefit, particularly unroaded backcountry and dispersed recreation activities. Sixty-one undeveloped recreation sites are identified for protection. Visual quality will be retained. Management of cultural and historical sites is the same as in all other alternatives.

Road closure proposals and restrictions on vehicle use will be the same as in all other alternatives, except that areas recommended for wilderness designation will be closed.

Air quality will not be significantly affected. Watershed conditions are expected to improve significantly. Water quality should improve moderately.

This alternative will reduce direct employment in timber harvest by approximately four jobs per year. Some gains could occur in jobs and income related to nonmotorized recreation and wildlife related recreation.

ALTERNATIVE D

Alternative D, like Alternative C, emphasizes environmental protection. However, Alternative D differs from Alternative C in that only portions of Wales Creek WSA, Hoodoo Mountain WSA, and Gallagher Creek 202 WSA, and all of Quigg West 202 WSA will be recommended for wilderness designation.

Alternative D will allocate 101,130 acres of CFL (90 percent) for forest management. Annual harvest activities will affect 1,313 acres, yielding 6,780 mbf/year. Approximately 10.2 miles of new road construction will be required annually. The only significant areas which will not be available for harvest are those included in the partial wilderness recommendation and active mining sites. Approximately 3,580 acres of CFL will be set aside or allocated to restrictive timber management to protect and maintain riparian and watershed values; 58,350 acres will be subject to restrictive timber management to protect or enhance important wildlife values; and 400 acres will be set aside to protect or enhance wildlife, watershed, soils, and recreation values. Forest management will be emphasized on the remaining 39,250 acres (34 percent) of CFL, subject to SOPs to maintain site productivity and water quality. Although the percentage of CFL acres allocated for forest management is high, 54 percent are subject to management restrictions in this alternative. Overall, the degree of impacts will be similar to current management.

The annual harvest activities will include 171 acres (13 percent) clearcut, 827 acres (63 percent) shelterwood cut, 53 acres (4 percent) seed tree cut, 223 acres (17 percent) selection cut, and 39 acres (3 percent) commercially thinned. Intensive management activities will be the same as Alternative A.

Range resources will be treated the same as in Alternative C and will have essentially the same impacts and results.

Portions of WSAs, totalling 14,350 acres, will be recommended for wilderness designation. Of the remaining acres, 440 will become a special management area and 12,600 acres will be allocated to other management areas with primary emphasis on wildlife habitat.

A unique geologic feature, consisting of 20 acres of an exposed limestone formation, will be recommended as an ACEC.

Under this alternative, 5,311 acres will be managed emphasizing riparian values. All other riparian habitat will be managed under SOPs to protect watershed values. Approximately 5,300 acres of noncommercial forest land containing important wildlife features will be available primarily for wildlife use. Winter range, land with good summer range potential for elk, and areas of concentrations of habitat features totalling 75,000 acres will be managed to protect or enhance wildlife habitat while allowing for the harvest of timber. In addition, 440 acres of largely undeveloped lands, set aside in previous land use plans, will be managed primarily for wildlife values.

Cumulative habitat impacts will be the same as in Alternative C.

Oil and gas leasing will be permitted on 191,236 acres of federal mineral estate (93 percent). Oil and gas leasing will be subject to seasonal restrictions on 78,550 acres and to stipulations prohibiting surface occupancy on 600 acres. These areas consist largely of important big game habitat. The 14,350 acres not leased are within areas recommended for wilderness designation. The remaining 112,086 acres will be leased subject to standard stipulations.

Exploration and development for locatable minerals will be permitted on 189,480 acres (92 percent). This is 7 percent less than under current management. The 15,830 acres withdrawn from mineral entry include the powersite withdrawals and the areas to be withdrawn to protect recreation, scientific, and historical sites, plus the recommendation of 14,350 acres for wilderness designation.

Resolution of the land ownership adjustment issue and access proposals remains the same as in Alternative B.

The reduced wilderness recommendation and the ACEC recommendation will result in the exclusion of 14,370 acres from corridor development. Another 11,640 acres will be identified as avoidance areas; public land within avoidance areas generally will not be available for corridor development. The remaining 119,650 acres (82 percent) will be available for further consideration. Criteria provided in the plan will guide future site-specific decisions.

Recreational activities will benefit as in Alternative C, except that 13,387 acres of WSA lands could be subject to development activities. The number of undeveloped recreation sites identified for protection will be the same as in Alternative C. Reduction of acres recommended for wilderness will result in fewer areas allocated to VRM Class I (visual quality retention). Management of cultural and historical sites is the same as in all other alternatives.

Road closure proposals and restrictions on vehicle use will be the same as in all other alternatives, except that areas recommended for wilderness designation will be closed.

Air quality will not be significantly affected. Watershed conditions are expected to improve significantly. Water quality should improve moderately.

This alternative will increase direct forest employment by four jobs over the current situation. Changes in ranch income will not be significant. Some increases in jobs and income related to nonmotorized and wildlife related recreation could occur.

ALTERNATIVE E

Alternative E is the preferred alternative.

The acreage of CFL available for timber management will fall between Alternatives A and B. Approximately 105,020 acres (93 percent) of CFL will be available for forest management activities. Annual harvest will affect 1,352 acres, yielding 7,030 mbf/year. Approximately 10.5 miles of new road construction will be required annually. The only significant areas of CFL not available for harvest will be special management areas; however, management restrictions will apply to 62 percent of the available CFL. Approximately 2,080 acres of CFL will be set aside or subject to restrictive timber management to protect and maintain riparian and watershed values; approximately 62,700 acres will be subject to restrictive management to protect or enhance important wildlife values; and approximately 6,620 acres will be set aside to protect or enhance wildlife, watershed, soils, and recreation values. The remaining 40,300 acres (38 percent) of CFL will emphasize forest management activities, subject to SOPs to maintain site productivity and water quality.

The annual harvest activities will include approximately 176 acres (13 percent) clearcut, 852 acres (63 percent) shelterwood cut, 54 acres (4 percent) seed tree cut, 230 acres (17 percent) selection cut, and 41 acres (3 percent) commercially thinned. Intensive management practices will be the same as Alternative A.

In this alternative 6,245 AUMs will be allocated to livestock use in the short term, a 5 percent increase over current licensed use. In the long term, available AUMs are projected to increase to 8,013. These additional AUMs are a combined estimate of additional forage from range improvements and improvement of vegetative conditions on 20 allotments under intensive grazing management.

Range improvements required to implement this alternative include about 300 acres of weed control, **53** miles of fence, **19** cattleguards, **32** springs, and **3** miles of pipeline. The estimated initial cost for the proposed improvements is **$356,100. (Text change in response to Comment P.)**

Livestock carrying capacity of the range resource is projected to increase 28 percent in the long term. It is expected that 90 percent of the range available for livestock grazing will be in good or excellent condition over the long term. Logged areas are not included in the 90 percent because the condition classification method is not applicable.

Livestock use affects 48 percent (29 miles) of the aquatic habitat in the resource area; 21 percent of the aquatic habitat is in suboptimum condition. Intensive grazing management is projected to improve all of the suboptimum habitat through increased bank stability and cover.

Quigg West, a 520-acre 202 WSA which adjoins a Forest Service RARE II area, will be recommended for wilderness designation in this alternative contingent upon the designation of the Quigg RARE II

area (1807) for wilderness. Special management will be emphasized on 8,120 acres largely comprised of portions of the WSAs.

A unique geologic feature, consisting of 20 acres of an exposed limestone formation, will be recommended as an ACEC.

Under this alternative 3,500 acres will be managed emphasizing riparian values. All other riparian habitat will be managed under SOPs to protect watershed values. Approximately 5,800 acres of noncommercial forest land containing important wildlife features will be available primarily for wildlife use. Winter range, land with good summer range potential for elk, and areas of concentrations of habitat features totalling 80,450 acres will be managed to protect or enhance wildlife habitat while allowing for the harvest of timber. In addition 8,140 acres of largely undeveloped lands, set aside in previous land use plans, will remain undeveloped. Cumulative adverse impacts to wildlife habitat are expected to be low to moderate. The impacts to wildlife will be mitigated on about 69 percent of the land base.

Oil and gas leasing will be permitted on 205,066 acres (99 percent) of federal mineral estate. Leasing will be subject to seasonal restrictions on 84,076 acres and to stipulations prohibiting surface occupancy on 8,180 acres. These restricted areas consist largely of road closures, important big game habitat, and special management areas. Approximately 520 acres, recommended for wilderness designation, will not be leased. The remaining 112,810 acres will be leased subject to standard stipulations.

Exploration and development for locatable minerals will be permitted on 203,310 acres (99 percent) in the resource area, similar to current management but with slightly more acreage withdrawn from mineral entry. In addition to the 1,460 acres withdrawn to protect recreation, powersites, powerlines, scientific, and historical sites under current management; withdrawal will also be proposed for the 520 acres recommended for wilderness designation and for the 20 acres recommended as an ACEC. A total of 2,000 acres will be withdrawn from mineral entry.

The land ownership adjustment issue will be resolved by identification of retention zones in areas where public lands will primarily be retained or enhanced. These retention zones total 126,872 acres. Most are characterized by reasonably consolidated holdings or contain resource values appropriate for public ownership. Public lands outside the retention zones total 18,788 acres. In general, these lands are in small tracts, widely scattered, and often without legal or physical access. They will be considered on their individual merits for retention, exchange, transfer, or sale. All site-specific decisions regarding land ownership adjustment will be made based on criteria identified in the plan.

Future investments in public facilities and improvements, including land and access acquisition, generally will receive highest priority in retention areas. Public access is proposed to an additional 9,500 acres; administrative access is proposed to an additional 8,150 acres. This alternative will result in overall improvement in the land ownership pattern and in legal access to public land.

Alternative E will exclude 540 acres, the wilderness recommendation and the ACEC recommendation, from corridor development. Another 17,620 acres will be identified as avoidance areas; public land with avoidance areas generally will not be available for corridor development. The remaining 127,500 acres (87.5 percent) will be available for further consideration. Criteria provided in the plan will guide future site-specific decisions.

Recreation opportunities will not be significantly affected by this alternative as developmental activities are directed away from key recreation areas. A total of 41 undeveloped recreation sites, near water or road closure gates, are identified for protection; this is one more than under current management. Other recreation management includes maintaining existing and potential walk-in hunting areas, cooperatively managing Garnet Ghost Town, managing the Garnet National Winter Recreation Trail, developing cross-country ski trails, and acquiring access to river tracts. No new outfitters and guides will be licensed for hunting except in conjunction with adjoining national forest lands. There will be no significant effects on visual quality. Management of cultural or historical sites will include interpreting key sites around Garnet and all others receiving protective management. There will be a beneficial effect on cultural resources.

Most public land will be designated as limited, with all vehicles, including ORVs, restricted to open roads and trails. Exceptions may be made for snowmobiles. The 520-acre Quigg West, the 20-acre ACEC, the 240-acre Karshaw Mountain area, and the 4,280-acre Ram Mountain area will be closed. The need for additional road closures will be considered on a case-by-case basis. Seasonal closures will be implemented in areas to provide wildlife security, reduce recreation conflicts, reduce road maintenance, provide watershed protection, and enhance recreation, including the opening of private lands for hunting. It is generally the policy that new roads be closed or limited for motorized vehicle use. All existing closures will continue.

Air quality will not be significantly affected. Watershed conditions are expected to improve significantly. Water quality should improve moderately.

This alternative will lead to an increase of five direct jobs in timber harvest and processing. Small increases in average ranch income will also occur under this alternative.

COMPARISON OF ALTERNATIVES

Tables S-1 and S-2 are reproductions of Tables 2-13 and 2-14 of the draft RMP/EIS. Corrections to these tables appear in bold print. These tables summarize range improvement and treatment costs, and projected changes in vegetative condition and classification for each alternative.

Tables S-3 and S-4 are reproductions of Tables 2-15 and 2-16 of the draft RMP/EIS. Corrections to these tables are shown in bold print. These tables summarize the management area allocations and resource allocations and outputs that would occur under each alternative.

TABLE S-1*

(TABLE 2-13 in draft RMP/EIS)

COMPARISON OF ALTERNATIVES: RANGE IMPROVEMENTS, TREATMENTS, AND COSTS

	Alternatives				
Improvement/Treatment	A (No Action)	B	C	D	E (Preferred)
Fence (mi)	22	104	**73**	**73**	**53**
Cattleguards (no)	7	32	**20**	**20**	**19**
Springs (no)	25	69	0	0	**32**
Pipeline (mi)	2	4	0	0	**3**
Weed Control (ac)	200	500	0	0	300
Total Installation Cost for **Proposed** Improvements	**$181,900**	**$689,000**	**$332,000**	**$332,000**	**$356,100**
20-yr Maintenance and Replacement Cost **for all Improvements**	**$553,190**	**$739,930**	**$623,120**	**$623,120**	**$618,240**
Total Cost [1] (20 years)	**$735,090**	**$1,428,930**	**$955,120**	**$955,120**	**$974,340**

[1] Range improvement and maintenance costs typically are shared by the BLM, the affected grazing permittees, and in some cases other agencies or landowners. The cost figures shown above represent a total estimate for all costs to all parties.

***Changes in this table are in response to Comment P.**

TABLE S-2
(TABLE 2-14 in draft RMP/EIS)
COMPARISON OF ALTERNATIVES: PROJECTED LONG-TERM CHANGES IN VEGETATIVE CONDITION/CLASSIFICATION

Condition/ Classification	Present Situation		Alternatives									
			A (No Action)		B		C		D		E (Preferred)	
	acres	%	acres	%	acres	%	acres	%	acres	%	acres	%
Excellent	11,974	8	11,974	8	11,974	8	23,934	16	23,934	16	11,974	8
Good	25,005	17	31,525	22	36,704	25	23,696	16	23,696	16	39,057	27
Fair	14,325	10	7,918	5	3,923	3	4,989	3	4,989	3	1,588	1
Poor	1,336	1	1,223	1	39	T	21	T	21	T	21	T
Waste	69,802	48	29,086	20	19,382	13	14,325	10	14,325	10	31,796	22
Unclassified	11,068	8	28,134	19	31,338	22	46,195	32	46,195	32	27,974	19
Logged	12,150	8	35,800	25	42,300	29	32,500	22	32,500	22	33,250	23
Total	145,660	100	145,660	100	145,660	100*	**145,660**	100	**145,660**	100	**145,660**	100

* Note — due to rounding off this column may not total 100 percent.

TABLE S-3
(TABLE 2-15 in draft RMP/EIS)
COMPARISON OF ALTERNATIVES: MANAGEMENT AREA ALLOCATIONS
(in acres)

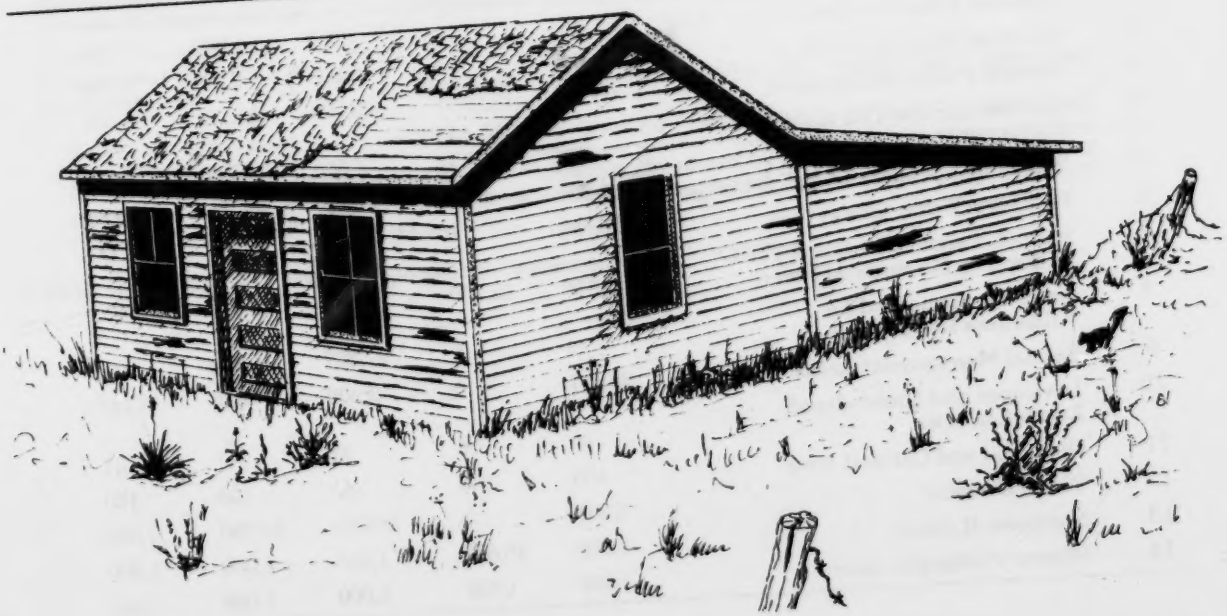
Number	Management Area	Alternatives				
		A (No Action)	B	C	D	E (Preferred)
1	Riparian Protection Zone	760	0	1,000	1,000	1,000
2	Riparian Multiple Use Zone	640	0	3,300	4,100	2,500
3	General Forest Management	63,460	112,000	32,000	32,750	36,900
4	Elk Summer and Fall Habitat Components	640	0	8,650	10,000	8,300
5	Big Game Summer and Fall Range	11,800	0	27,350	39,500	48,850
6	Big Game Winter Range	19,500	0	25,200	25,500	23,300
7	Noncommercial Forest and TPCC Withdrawn Commercial Forest	9,500	22,000	5,300	5,300	5,800
8	Areas Recommended for Wilderness Designation	0	0	27,737	14,350	520
9	Special Management Areas	28,457	0	2,400	440	8,140
10	Developed and Undeveloped Recreation Sites	40	0	61	61	41
11	Historical and Cultural Sites	160	160	160	160	160
12	Visual Corridor	6,500	0	10,200	10,200	7,850
13	Nonforest Habitat	3,200	10,500	1,300	1,300	1,300
14	Mineral Production Area	1,000	1,000	1,000	1,000	1,000

TABLE S-4

(TABLE 2-16 in draft RMP/EIS)

COMPARISON OF ALTERNATIVES: RESOURCE ALLOCATIONS AND OUTPUTS
(in acres unless otherwise indicated)

Allocation/Output	Alternatives				
	A (No Action)	B	C	D	E (Preferred)
RENEWABLE RESOURCES					
Total CFL Available for Harvest	87,920	112,000	87,930	101,130	105,020
CFL Restricted[1]	22,460	0	49,430	61,880	64,720
Other Restricted[2]	8,518	11,542	8,518	8,518	8,518
CFL Nonproblem	56,942	100,528	29,972	30,732	31,980
Total CFL Set Aside	24,540	400	24,540	11,330	7,440
Estimated Allowable Harvest (mbf/yr)	6,370	8,560	5,960	6,780	7,030
New Roads (mi/yr)	9.6	12.9	9.0	10.2	10.5
Total P.L. Available for Livestock Grazing	118,460	145,660	107,530	107,530	111,890
P.L. Under Intensive Grazing Management	35,728	95,480	84,977	84,977	83,263
AMP Allotments (no)	10	24	28	28	20
Total P.L. Excluded From Livestock Grazing	27,200	0	38,130	38,130	33,770
Livestock Forage Target (AUMs)					
— short-term	5,930	9,211	3,595	3,595	6,245
— long-term	6,981	11,662	4,232	4,232	8,013



SPECIAL ATTENTION RESOURCES					
Total P.L. Recommended for Wilderness Designation	0	0	27,737	14,350	520
Total P.L. Designated as ACEC	0	0	20	20	20
Total P.L. with Wildlife Habitat Emphasis (wildlife goals)	74,500	32,500	102,237	101,490	99,710
Riparian Habitat with Wildlife and Watershed Mgmt Emphasis (MA 1,2)	1,400	0	4,300	5,100	3,517
Riparian Habitat with Watershed Mgmt Emphasis Only (MA 3-13)	4,678	6,078	1,778	978	2,561
Riparian Habitat Within Mineral Production Areas (MA 14)	98	98	98	98	98
Unsatisfactory Riparian Habitat Targeted for Improvement thru Intensive Grazing Mgmt	2,038	3,585	3,603	3,603	3,094
Unsatisfactory Riparian Habitat Not Targeted for Improvement thru Intensive Grazing Mgmt	2,166	619	601	601	1,110
Satisfactory Riparian Habitat Targeted for Maintenance thru Intensive Grazing Mgmt	637	808	637	637	637
Big Game Winter Range Targeted for Improvement through Intensive Grazing Management	3,290	5,450	5,929	5,929	5,370
NONRENEWABLE RESOURCES					
Total P.L. Available for Oil and Gas Leasing	205,586	205,586	177,849	191,236	205,066
Surface Occupancy Permitted with Standard Stipulations	135,372	205,426	109,239	112,086	112,810
Surface Occupancy Permitted with Seasonal Restrictions	36,874	0	66,050	78,550	84,076
No Surface Occupancy	33,340	160	2,560	600	8,180
Total P.L. Closed to Oil and Gas Leasing	0	0	27,737	14,350	520
Total Federal Minerals Open to Mineral Entry	203,850	203,850	176,093	189,480	203,310
Total P.L. Withdrawn from Mineral Entry	1,460	1,460	29,217	15,830	2,000

LAND OWNERSHIP AND ADMINISTRATION					
Total P.L. within Retention Areas	145,660*	126,872	126,872	126,872	126,872
Total P.L. within Areas Considered for Exchanges and Sales	0*	18,788	18,788	18,788	18,788
Total P.L. to be Excluded from Utility and Transportation Corridor Development	0	0	27,757	14,370	540
Total P.L. to be Avoided by Corridor Development	30,060	160	12,253	11,640	17,620
Total P.L. Available for Further Consideration for Corridor Development	115,600	145,500	105,650	119,650	127,500
RECREATION, CULTURAL, AND AESTHETIC RESOURCES					
Total P.L. Available for Roadless Nonmotorized Recreation	28,460	0	30,137	14,790	8,660
Total P.L. Available for Roaded and/or Motorized Recreation	107,960	145,660	106,262	121,609	131,919
Total P.L. Roaded but not Available for Motorized Recreation	9,200	0	9,200	9,200	5,040
Total P.L. Protected for Recreation Sites	40	0	61	61	41
Total P.L. with Visual Resource Management Emphasis	6,500	0	10,200	10,200	7,850
Total P.L. with Historic and Cultural Resource Mgmt Emphasis	160	160	160	160	160

* Alternative A assumes a continuation of the existing land ownership pattern for analysis purposes.

[1] CFL within MAs 2, 4, 5, 6, and 10; timber harvest permitted but restricted by special multiple use considerations.

[2] TPCC restricted or, in some cases, both TPCC restricted and restricted by MA guidelines.

[3] **CFL Nonproblem relates to the MA classification concept, i.e., acres not allocated to restricting MAs.**

P.L. = Public Land

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R-3 Fixed Costs for an Average Ranch in Size Class 1 ..... Draft 303
R-4 Production Receipts for an Average Ranch in Size Class 2 ..... Draft 304
R-5 Variable Costs for an Average Ranch in Size Class 2 ..... Draft 304
R-6 Fixed Costs for an Average Ranch in Size Class 2 ..... Draft 305
R-7 Production Receipts for an Average Ranch in Size Class 3 ..... Draft 305
R-8 Variable Costs for an Average Ranch in Size Class 3 ..... Draft 306
R-9 Fixed Costs for an Average Ranch in Size Class 3 ..... Draft 306
R-10 Production Receipts for an Average Ranch in Size Class 4 ..... Draft 307
R-11 Variable Costs for an Average Ranch in Size Class 4 ..... Draft 307
R-12 Fixed Costs for an Average Ranch in Size Class 4 ..... Draft 308

APPENDIX U

U-1 Resource Monitoring and Evaluation Plan ..... Final 101

INTRODUCTION

PURPOSE AND NEED

The proposed Garnet Resource Management Plan (RMP) will provide a comprehensive framework for managing the public lands and allocating resources in the Garnet Resource Area (GRA) for the next ten or more years. This document publishes the comments received on the draft RMP/EIS and incorporates by reference the draft RMP/EIS which addressed the future management of 145,660 surface acres and 213,385 subsurface acres of mineral estate. These lands are administered by the Bureau of Land Management (BLM) through its Butte District Office and Garnet Resource Area in Montana (see the Garnet Resource Area Location map).

The proposed RMP is reproduced in Chapter 8 of this document. This plan addresses the resolution of five issue groups (see Chapter 1 of the draft RMP/EIS). In addition, several statutory or court ordered requirements will be met upon final approval of the RMP/EIS.

As required by Section 603 of the Federal Land Policy and Management Act (FLPMA), this document analyzes the suitability of two wilderness study areas in the GRA and makes a preliminary recommendation for inclusion in the National Wilderness Preservation System or for a return to multiple use management. These recommendations will be reported to Congress through the Director of the BLM, Secretary of the Interior, and the President. The final decision on wilderness designation will be made by Congress. The draft RMP/EIS recommended both Wales Creek and Hoodoo Mountain WSAs as nonsuitable for wilderness designation.

BLM was granted permission to study two tracts of land for potential wilderness under Section 202 of FLPMA. Recommendation for wilderness designation will be reported to Congress through the Director of the BLM, Secretary of the Interior, and the President. The final decision on wilderness designation will be made by Congress. Recommendations against wilderness designation will be made by the State Director in the Record of Decision for the RMP/EIS. The draft RMP/EIS recommended the Quigg West 202 Study Area as suitable and the Gallagher Creek 202 Study Area as nonsuitable for wilderness designation.

The document also analyzes several alternatives for livestock grazing on public land. This fulfills a court ordered agreement based on a 1973 lawsuit against the BLM by the Natural Resources Defense Council.

This planning document incorporates land use planning guidance previously found in five separate Management Framework Plans (MFP): the Blackfoot, Hoodoo, Salmon Lake, Avon, and Philipsburg MFPs. This document also develops and revises resource management guidance as prescribed in Section 202 of FLPMA.

PLANNING PROCESS OVERVIEW

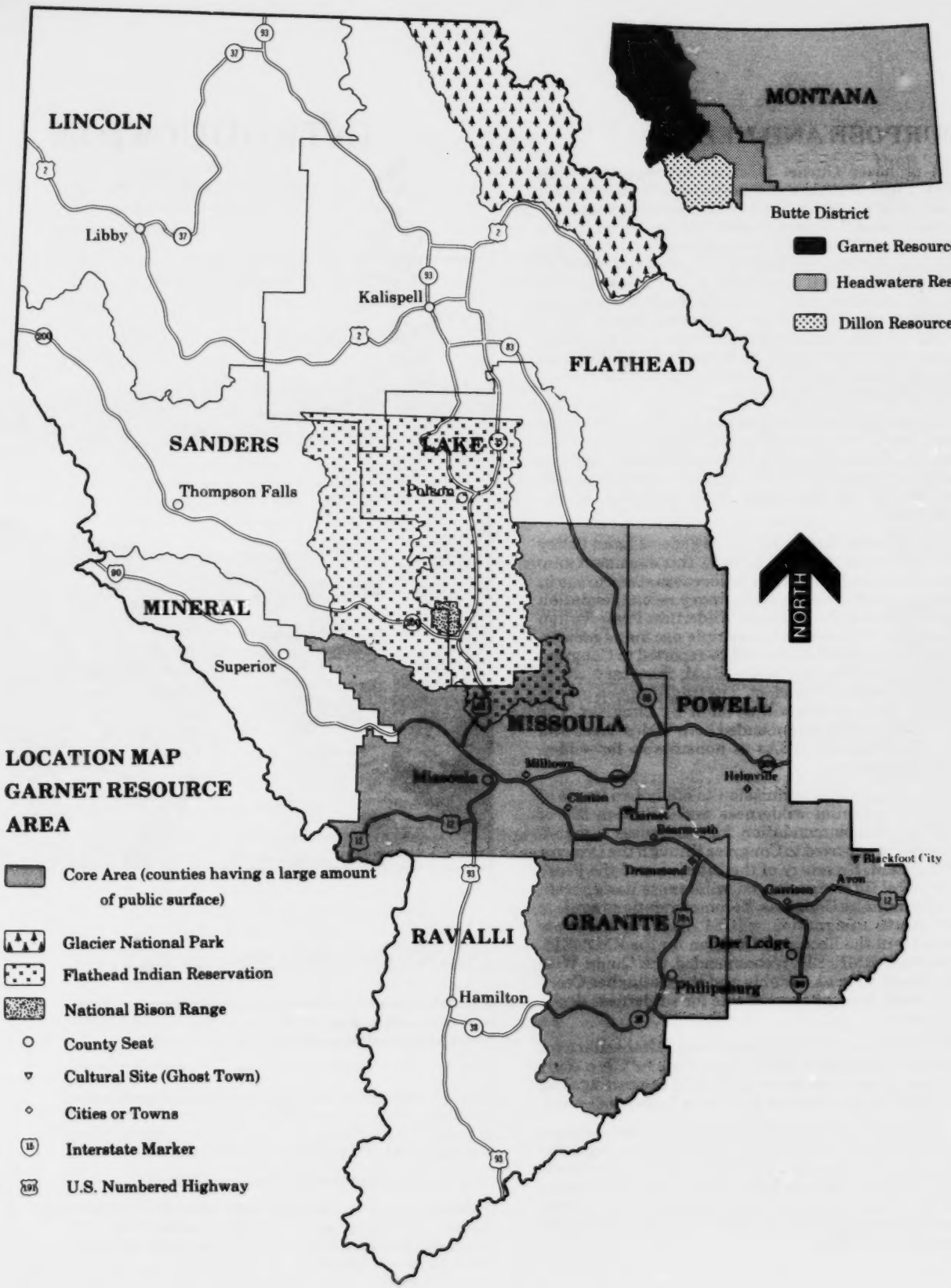
The BLM resource management planning process has nine steps. Figure I-1 lists and highlights the steps where public participation is needed.

Step 1. Identification of Issues

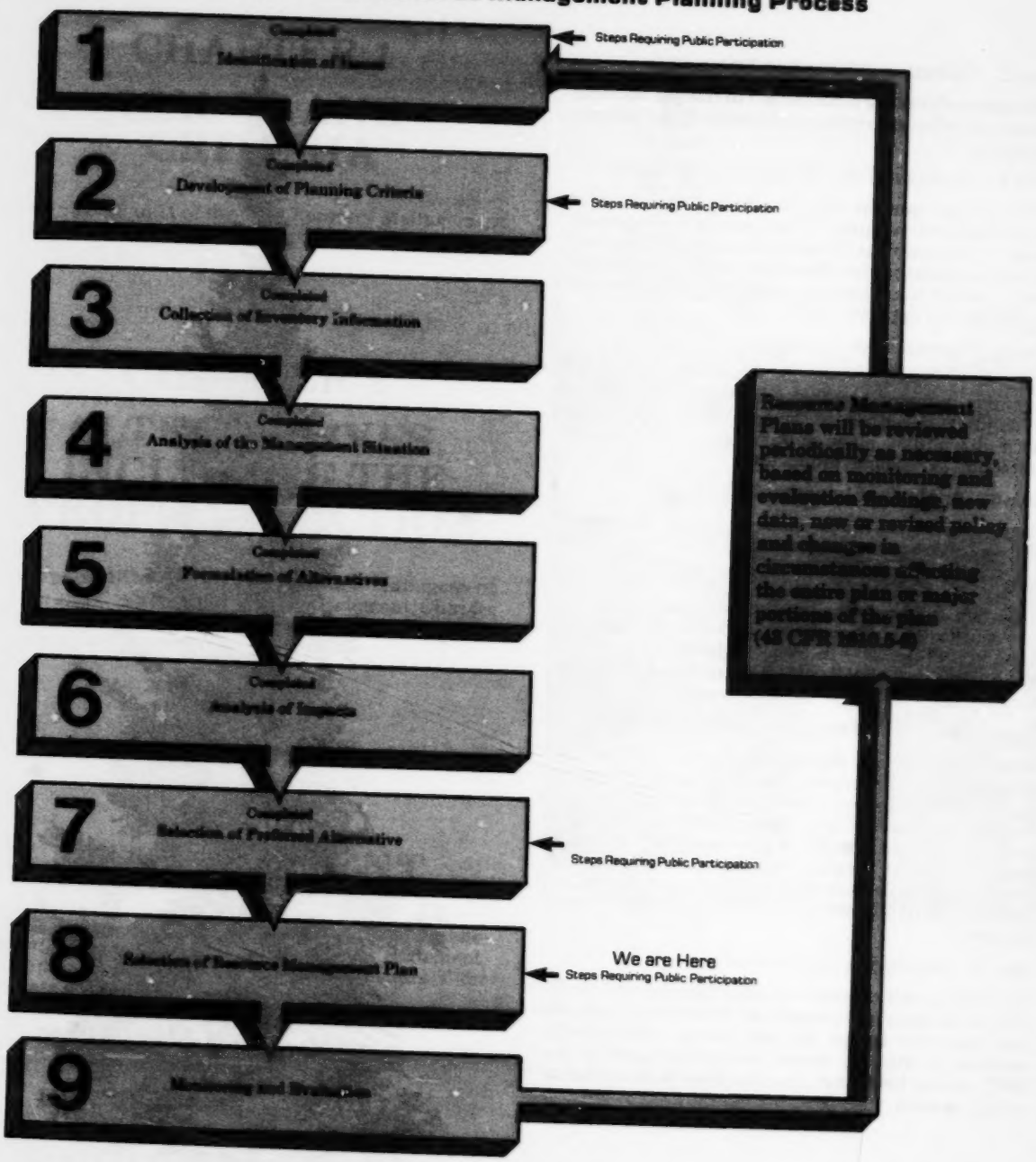
This step identifies resource management concerns, conflicts, and opportunities that can be resolved through the planning process. This process is called scoping and involves public participation.

Step 2. Development of Planning Criteria

This step identifies the information needed to resolve issues, formulate and evaluate alternatives, and select the preferred alternative. The criteria are circulated for public review.


MONTANA
Butte District
Garnet Resource Area
Headwaters Resource Area
Dillon Resource Area
LINCOLN
Libby
Kalispell
FLATHEAD
SANDERS
LAKE
Thompson Falls
Polson
MINERAL
Superior
NORTH
MISSOULA
POWELL
Missoula
Helmville
Clinton
Drummond
Garrison
Avon
Blackfoot City
GRANITE
Deer Lodge
Philipsburg
RAVALLI
Hamilton
LOCATION MAP
GARNET RESOURCE
AREA
Core Area (counties having a large amount of public surface)
Glacier National Park
Flathead Indian Reservation
National Bison Range
County Seat
Cultural Site (Ghost Town)
Cities or Towns
Interstate Marker
U.S. Numbered Highway

Steps in the Resource Management Planning Process


1
Steps Requiring Public Participation
2
Development of Planning Criteria
Steps Requiring Public Participation
3
4
5
6
7
Steps Requiring Public Participation
8
We are Here
Steps Requiring Public Participation
9
Resource Management Plans will be reviewed periodically as necessary, based on monitoring and evaluation findings, new data, new or revised policy and changes in circumstances affecting the entire plan or major portions of the plan (43 CFR 1610.5-5)

Step 3. Collection of Inventory Information

This step collects the data needed to resolve resource issues and other environmental, social, and economic concerns.

Step 4. Analysis of the Management Situation

This step assesses the current situation and provides a baseline for development of a resource management plan. A Management Situation Analysis (MSA) document is produced that describes the physical situation, current management guidance, and resource problems and opportunities.

Step 5. Formulation of Alternatives

This step prepares several complete, reasonable resource management alternatives. A no action alternative describes present management while other alternatives place emphasis on environmental protection or resource production.

Step 6. Analysis of Impacts of Alternatives

This step analyzes the physical, biological, economic, and social impacts of implementing each alternative.

Step 7. Selection of the Preferred Alternative

This step compares the impacts of each alternative and selects the preferred alternative. The interdisciplinary process used in Steps 5 through 7 is documented in a draft RMP/EIS and circulated for public review.

Step 8. Selection of the Resource Management Plan

This step analyzes public comments, modifies the alternatives as appropriate, and serves as a basis for the District Manager to select a proposed resource management plan. The proposed RMP and final EIS is distributed to the public in the final RMP/EIS document. A 30-day protest period is allowed before the resource management plan is adopted. A Record of Decision is published after a consideration of any protests.

Step 9. Monitoring and Evaluation

This step monitors and evaluates the resource condition as the plan is implemented. If monitoring shows that resource issues are not being satisfactorily resolved or that the desired results outlined by the RMP are not being met, the plan may be amended or totally revised.

CHAPTER 1
ISSUES AND CRITERIA

(See pages 7 to 11 of the draft Resource Management Plan and Environmental Impact Statement, and Chapter 8 for Text Changes.)

CHAPTER 2
ALTERNATIVES, INCLUDING THE PROPOSED ACTION

(See pages 13 to 60 of the draft Resource Management Plan and Environmental Impact Statement, Chapter 8 for Text Changes to the Proposed RMP and Alternatives, and Appendix T for Errata.)

CHAPTER 3
AFFECTED ENVIRONMENT

(See pages 61 to 102 of the draft Resource Management Plan and Environmental Impact Statement, Chapter 8 for Text Changes, and Appendix T for Errata.)

CHAPTER 4
ENVIRONMENTAL CONSEQUENCES

(See pages 103 to 160 of the draft Resource Management Plan and Environmental Impact Statement, Chapter 8 for Text Changes, and Appendix T for Errata.)

CHAPTER 5
CONSULTATION AND COORDINATION

This resource management plan was prepared by an interdisciplinary team of natural resource specialists from the Garnet Resource Area and the Butte District offices. Beginning in December 1980, a nine step process led to the RMP's formulation. Four of the nine steps, including the review of this document, have allowed for public review and comment. This BLM planning process is outlined in full in the Introduction. Consultation and coordination with various agencies, organizations, and individuals occurred throughout the planning process.

CONSISTENCY

The BLM's planning regulations require that resource management plans be "consistent with officially approved or adopted resource related plans of other federal agencies, state and local governments, and Indian tribes, so long as the guidance and resource management plans are also consistent with the purposes, policies and programs of federal law, and regulations applicable to public lands . . .". Interested parties have been notified and their comments solicited.

The State Historic Preservation Officer and the Advisory Council on Historic Preservation were given an opportunity to review the draft RMP. Also, the Governor's Task Force on Planning was briefed in October 1984.

PUBLIC PARTICIPATION

A Federal Register notice was published on February 20, 1981 that announced the formal start of the planning process.

A preliminary list of 17 major issues was mailed to about 600 individuals and organizations for comment in February 1981. Open houses on the issues were held February 25, 1981 in Drummond; February 26, 1981 in Missoula; March 3, 1981 in Philipsburg; and March 5, 1981 in Ovando. The District Advisory Council also reviewed the preliminary issues and the public response to them in March 1981. As a result of the input from about 100 persons who attended the open houses and 60 written comments, issues were redefined and three new ones were added. These were published for further public comment in November 1981. These were subsequently grouped into five broad issues from which the plan developed. The final list was published in August 1982.

Resource inventories were conducted in 1982 and 1983, and a management situation analysis was prepared that examined the capability of the public lands to accommodate the needs and issues previously identified. The criteria for developing the RMP and the District Manager's Concept of the RMP were published for public review in July 1983. Five comments were received.

In early 1984, work began on the formulation of alternatives. Resource specialists aided in the development and made suggestions on resource allocations leading to the analysis of alternatives as laid out in the draft RMP/EIS.

After the draft RMP/EIS was filed with the Environmental Protection Agency in December 1984 and released to the public, a period of 90 days was allowed for public review and comment. The Federal Register of December 14, 1984 carried a notice of availability and announced a public hearing and two open houses at Missoula and Drummond, Montana on February 13, 1985 and February 20, 1985 respectively.

A news release published on December 16, 1984 announced the availability of the draft RMP/EIS and gave a summary of the document. This release, which gave the times and locations for the hearing and open houses, was sent to national wire services, daily newspapers, weekly newspapers, radio stations, and television stations throughout western Montana.

Approximately 400 copies of the draft RMP/EIS were distributed to governmental agencies, businesses, organizations, grazing lessees, and interested individuals. Public reading copies were available at BLM offices in Washington D.C.; Billings, Butte, and Missoula, Montana; the University of Montana and Montana State University; and the public libraries in Missoula, Granite, and Powell counties.

Seven individuals testified at the hearing in Missoula and 47 comment letters were received by the close of the comment period. The transcript of the hearing and written comments are reproduced in Chapter 7. A summary of the comments and the responses to the comments are also in Chapter 7.

Other informal coordination with the public took place throughout the planning process by means of personal contacts, phone calls, etc. Table 5-1 lists the public participation activities that occurred after the formulation of alternatives.

TABLE 5-1

LIST OF PARTICIPANTS IN BRIEFINGS AND OPEN HOUSES

BRIEFINGS

Date	Attendees (other than BLM)	Representing
09-17-84	Larry Brown	State Water Quality Board
	Tom Ellerhoff	Department of Health and Environmental Sciences
	Ralph Driear	Governor Schwinden
	Bob Martinka	Department Fish, Wildlife, and Parks
	John Larson	Department of Agriculture
	Reed Lommen	Department of State Lands
	Pete Husby	Department of Natural Resources and Conservation
11-02-84	Darrel Kenops	Forest Service
	Jack Fisher	Forest Service
01-28-85	Dennis Workman	
	Don Peters	All from Montana Department
	Bill Thomas	Fish, Wildlife, and Parks
	Earl Davis	
	John Firebaugh	
	Jim Ford	
	Jay Haveman	
	Kurt Alt	
01-28-85	Jennifer Cote	Montana Fish and Game Association
	Don Aldrich	National Wildlife Federation
02-04-85	Jim Bentley	
	Chuck Seeley	All from Champion Timberlands
	Bob Symes	
	John Dahlberg	
	Wayne Maahs	
02-04-85	Jerry Bignell	
	Georgia Bignell	All ranchers representing themselves.
	Hal Hansen	
	Dutch Weaver	
	Emmett Coughlin	
	Gene Coughlin	

BRIEFINGS (Continued)

Date	Attendees (other than BLM)	Representing
02-06-85	Gary Oliphant	Five Valley Four Wheelers
	Mike Whitman	Five Valley Four Wheelers
	Kathy Whitman	Montana 4x4 Association
	Mavis Lorenz	Cross Country Skiers
	Marvin Hammer	Missoula Snowgoers and Montana Snowmobiling Association
02-06-85	Arnold Bolle	The Wilderness Society
	Tom Sewell	Montana Wilderness Association
	Jim Curtis	Sierra Club
02-07-85	William Murphy	Butte District Grazing Advisory Board and Self (Rancher)
02-07-85	Don Pocha	Self (Rancher)
02-08-85	Chuck Seeley	Champion Timberlands
	Kelsey Milner	Champion Timberlands
02-08-85	Dominic Job	Montana Mining Association
	Lew Shull	Montana Mining Association
02-12-85	Bob Neal	All ranchers representing themselves.
	Evelyn Neal	
	Larry Clark	
	Brent Smith	
	Bill Vietor, Jr.	
	Mike Toney	
02-19-85	Land Lindbergh	Self (Rancher)
	Bill Potter	Self (Rancher)
	Leonard Iverson	Self (Rancher)
	Hank Goetz	Lubrecht Experimental Forest
02-26-85	Kurt Knievel	All Forest Service
	Ron Roginske	
	Gary Learn	
	Howard Challinor	
02-28-85	Ben Stout	All University of Montana School of Forestry
	Bob Pfister	
	Sid Frissel	
	Don Potts	

OPEN HOUSE/HEARING

Date	Attendees (other than BLM)	Representing
02-13-85 (Missoula)	Kathy Whitman	Five Valley Four Wheelers
	Mike Whitman*	Montana 4x4 Association
	Gary Oliphant	Five Valley Four Wheelers
	Rena Oliphant	Five Valley Four Wheelers
	Chris Rockey	Missoula County Community Development
	Karen Timchack	Missoula County Community Development
	T. T. Smith	Mining
	Elsie Smith	Mining
	Howard Harper	Self
	Ralph Smith	Mining
	Leonard Iverson	Ranching
	W. Sanders III	Landowner, Ten Mile
	Ivan Leigland*	Garnet Preservation Association
	Arnold Stoverud*	Mining History
	Mrs. Arnold Stoverud	Mining History
	Dick Kulawinski	Self
	Russ Lawrence*	Garnet Preservation Association
	Helen Hammond*	Garnet Preservation Association
	Mary Jane Morin*	Garnet Preservation Association
	Bruce Cox	Geology
	Tom Sewell*	Montana Wilderness Association
02-20-85 (Drummond)	Earleen Alder	Self
	Dean Dutton	Rancher
	David Dutton	Rancher
	Frank Trask, Jr.	Self
	John Hollenback	Rancher
	Frank Fitzgerald	Landowner, Garnet
	J. Dinsmore	Rancher
	Steve Stolp	Landowner, Yourname Creek
	Fred Weaver	Rancher
	Stewart Baker	Rancher
	Bill Baker	Rancher
	Ray Piche	Self
	Audrey Piche	Self
	Emmett Weaver	Drummond City Counsel

*Written or oral testimony given

CONSULTATION AND COORDINATION

The RMP team consulted with or received input from the following organizations during the development of the RMP.

Federal Agencies

U. S. Air Force
U. S. Army Corps of Engineers
U. S. Department of Agriculture
  Farmers Home Administration
  Forest Service
  Soil Conservation Service
U. S. Department of the Interior
  Bureau of Indian Affairs
  Bureau of Land Management
  Bureau of Mines
  Bureau of Reclamation
  Fish and Wildlife Service
  Geological Survey
  Minerals Management Service
  National Park Service
Environmental Protection Agency

State Agencies and Organizations

Montana Bureau of Mines and Geology
Montana Department of Agriculture
Montana Department of Health and Environmental Sciences
Montana Board of Natural Resources and Conservation
Montana Department of Natural Resources and Conservation
Montana Division of Forestry
Montana Department of Fish, Wildlife, and Parks
Montana Department of Highways
Montana Department of State Lands
Montana State Historic Preservation Officer
Montana State University
Office of the Governor
University of Montana

Congressional Offices

Office of Congressman Pat Williams
Office of Senator Max Baucus
Office of Senator John Melcher

Montana Legislators (1981-1984)

Ben Hanson
John Manley
Bob Ream
M. K. Daniel

Local Government

Granite County Commissioners
Granite County Planning Office
Missoula County Commissioners
Missoula Development Office
Powell County Commissioners
Powell County Planning Office

Organizations and Businesses

Montana Cattlemen's Association
Montana Woolgrowers
Montana Stockgrowers Association
Bonita-Clinton-Potomac Cattle Association
Greenough Woodland Grazing Group
Public Lands Council
Institute of the Rockies
Outdoor Resources Center
Wilderness Institute
The Wilderness Society
Montana Wilderness Association
Clark Fork Protective Association
Upper Clark Fork Valley Protective Association
Nature Conservancy
Environmental Information Center
Natural Resources Defense Council
NRDC Public Lands Institute
Outdoors Unlimited
National Council of Public Land Users
Champion Timberlands
Burlington Northern, Incorporated
Plum Creek Timber Company
Inland Forest Resource Council
Montana Loggers Association
Montana Women in Timber
Louisiana Pacific Corporation
Pyramid Mountain Lumber Company
Montana Lumber Sales, Incorporated
Stoltze Land and Lumber Company
Chamber of Commerce
Montana Power Company
Missoula Electric Cooperative
Blackfoot Telephone Cooperative
Western Montana Trade Association
Pacific Power and Light
Butte District Advisory Council
Butte District Grazing Advisory Board
League of Women Voters
Meridian Minerals Company
Montana Wildlife Federation
Western Montana Fish and Game Association
Defenders of Wildlife
Trout Unlimited
Montana Wildlife Society
Montana Historical Society
Western Montana Ghost Town Society
Garnet Preservation Association
Montana 4x4 Association
Historical Research Associates
Hellgate Motorcycle Club
Swan River Trophy Hunters
Mountaineering Club
Pintlar Audubon Society

Ponderosa Snow Warriors
5 Valley 4 Wheel Drive Club
Montana Snowmobile Association
Seeley Lake Driftriders
Missoula Snowgoers
Anaconda Sportsmens Club
Montana Outfitters and Guides Association
Champlin Petroleum Company
Montana Mining Association
Exxon Minerals Company
Montana Barite Company
Utah International, Incorporated
Peabody Development Company
Atlantic Richfield Company
Amoco Minerals Company
Amoco Production Company
Alt and Hyndman
Earthworks, Incorporated
Continental Oil Company
Noranda Exploration, Incorporated
Burwest
Geoplan, Incorporated
Union Carbide Corporation
Cominco American
Rocky Mountain Oil and Gas Association
Phillips Petroleum
Hellgate Mineral Society

Others Contacted

All the Garnet Resource Area grazing lessees were contacted as well as area libraries, newspapers, radio, and television stations and numerous individuals.

DISTRIBUTION

Over 330 copies of the proposed RMP and final EIS are being sent to the following agencies, businesses, and interest groups for their review.

Federal Agencies

Agriculture Department
  Forest Service
  Soil Conservation Service
Air Force
Army Corps of Engineers
Energy Department
  Bonneville Power Administration
Environmental Protection Agency
Interior Department, Secretary
  Bureau of Indian Affairs
  Bureau of Land Management
  Bureau of Mines
  Bureau of Reclamation
  Fish and Wildlife Service
  Geological Survey
  Minerals Management Service
  National Park Service

Public Officials

U.S. Senator Max Baucus
U.S. Senator John Melcher
U.S. Representative Pat Williams
Governor of Montana
  Lt. Governor of Montana
Missoula County Commissioners
Granite County Commissioners
Powell County Commissioners

State Agencies

Montana Bureau of Mines and Geology
Montana Department of Agriculture
Montana Department of Fish, Wildlife, and Parks
Montana Department of Health and Environmental Science, Water Quality Bureau
Montana Department of Natural Resources
Montana Department of State Lands
Montana Division of Forestry
Montana Historic Preservation Officer
Montana State Clearinghouse
Montana State University
Office of the Governor
University of Montana

Local Agencies

Granite County Planning Office
Missoula County Planning Office
Powell County Planning Office

Indian Tribes

Confederated Salish and Kootenai

Businesses

Amoco Production Company
Atlantic Richfield Company
Bignell Ranch Company
Blackfoot River Ranch
Black Sheep Ranch
Castle Mountain Ranch, Incorporated
Champion Timberlands
Champlin Petroleum Company
Cominco American
Continental Oil Company
Dutton Hereford Ranch
Enman and Nakken, Incorporated
Environmental Impact Services
Exxon Minerals Company
Gimlet Creek Ranch
Homestake Mining Company
Jacobs Engineering Group
Jensen Ranch Company
Joseph Industries
Kolbeck Ranches, Incorporated
Lindbergh Cattle Company
Louisiana Pacific Corporation

Meridian Minerals Company
Missoula Electric Cooperative
Montana Power Company
Nelson Ranch Company
Northwest Irrigation, Incorporated
Planning and Engineering Resources
Plum Creek Timber Company
Pyramid Mountain Lumber Company
Rock Creek Cattle Company
Rocking Chair Ranch
R. V. Ranch Company
Shell Western E & P, Incorporated
Southern California Edison
Tuning Fork Ranch
Wales Brothers, Incorporated
X Diamond Bar Ranch

Organizations

Advisory Council on Historic Preservation
Audubon Society
Back Country Horsemen of Missoula
Bonita-Clinton-Potomac Cattle Association
Butte District Advisory Council
Butte District Grazing Advisory Board
Defenders of Wildlife
Five Valley Four Wheelers
Hellgate Mineral Society
Historical Research Association
Inland Forest Resource Council
Montana Association of Conservation Districts
Montana Historical Society
Montana Logging Association
Montana Mining Association
Montana Snowmobile Association
Montana Stockgrowers Association
Montana Wilderness Association
Montana Women in Timber
National Wildlife Federation
National Resources Defense Council
Outdoor Resources Center
Outdoors Unlimited
Ponderosa Snow Warriors
Public Lands Council
Rocky Mountain Oil and Gas Association
Seeley Lake Driftriders
Sierra Club
Sunnyslope Grazing Association
Trout Unlimited
Western Environmental Trade Association
Western Montana Fish and Game Association
Western Montana Ghost Town Preservation Association
Wilderness Association
Wilderness Institute
Wilderness Society
Wildlife Society

Others

News Media
Libraries
Grazing Lessees
Interested Individuals

CHAPTER 6
LIST OF PREPARERS

(See pages 165 to 166 of the draft Resource Management Plan and Environmental Impact Statement, and Appendix T for Errata.)

CHAPTER 7
PUBLIC COMMENTS

COMMENT ANALYSIS

Summary of the Comments

A total of 48 individuals, private organizations, and federal and state agencies submitted comments on the recommendations and/or analysis contained in the draft Garnet RMP/EIS. Oral statements were presented by three individuals or organizations at the public hearing in Missoula, Montana; and five letters were entered into the record.

Most of those submitting comments were concerned with wilderness recommendations, grazing, road management, wildlife habitat management, and forest management. Table 7-1 shows the number of contributors by topic or resource.

TABLE 7-1

NUMBER OF COMMENTS BY TOPIC OR RESOURCE

Topic or Resource	Number of Letters Providing Comments
Wilderness	17
Grazing	11
Forest Management	11
Road Management	11
Wildlife Habitat Management	10
Garnet Ghost Town	9
Recreation Management and Use	9
Mining, Geology, Oil and Gas	9
Water	6
Land Ownership Adjustments	6
Economics	5
Special Management Areas	4
Weed Control	4
Cultural	3
Riparian Habitat Management	3
Monitoring	2
Miscellaneous	6

The wilderness recommendations drew the most comments (17). Forty percent of those addressing the wilderness recommendations favored designating more land as wilderness. Sixty percent supported the amount of land designated as wilderness in the preferred alternative.

On the other issues, there was a broad spectrum of comments. There were those who thought not enough emphasis was placed on wildlife habitat management, while others thought there was too much emphasis. Likewise three comments challenged the level of allowable cut as being too high, while seven thought it was good and one thought it was too low.

About 40 percent of the comments expressed a liking of the preferred alternative. Eight percent stated a preference for one of the other alternatives.

Most of the comments came from Montana. Nearly two-thirds of the comments came from within the counties that will be directly affected by the Garnet RMP/EIS.

Analysis and Review Procedures

All comments were reviewed and considered. Comments warranting responses were those which:

relate to inadequacies or inaccuracies in the analysis or methodologies used,

identify new significant impacts,

recommend reasonable new alternatives,

involve disagreements on interpretations of significance, or

indicate significant misconceptions or misinterpretations of BLM programs and policies.

Each letter and each person's testimony given at the hearing are reproduced in this chapter. Table 7-2 is a list of contributors and their corresponding identification number.

Portions of the comment letters are bracketed. The brackets have been assigned either a number or an

TABLE 7-2

COMMENTS RECEIVED ON THE DRAFT RMP/EIS

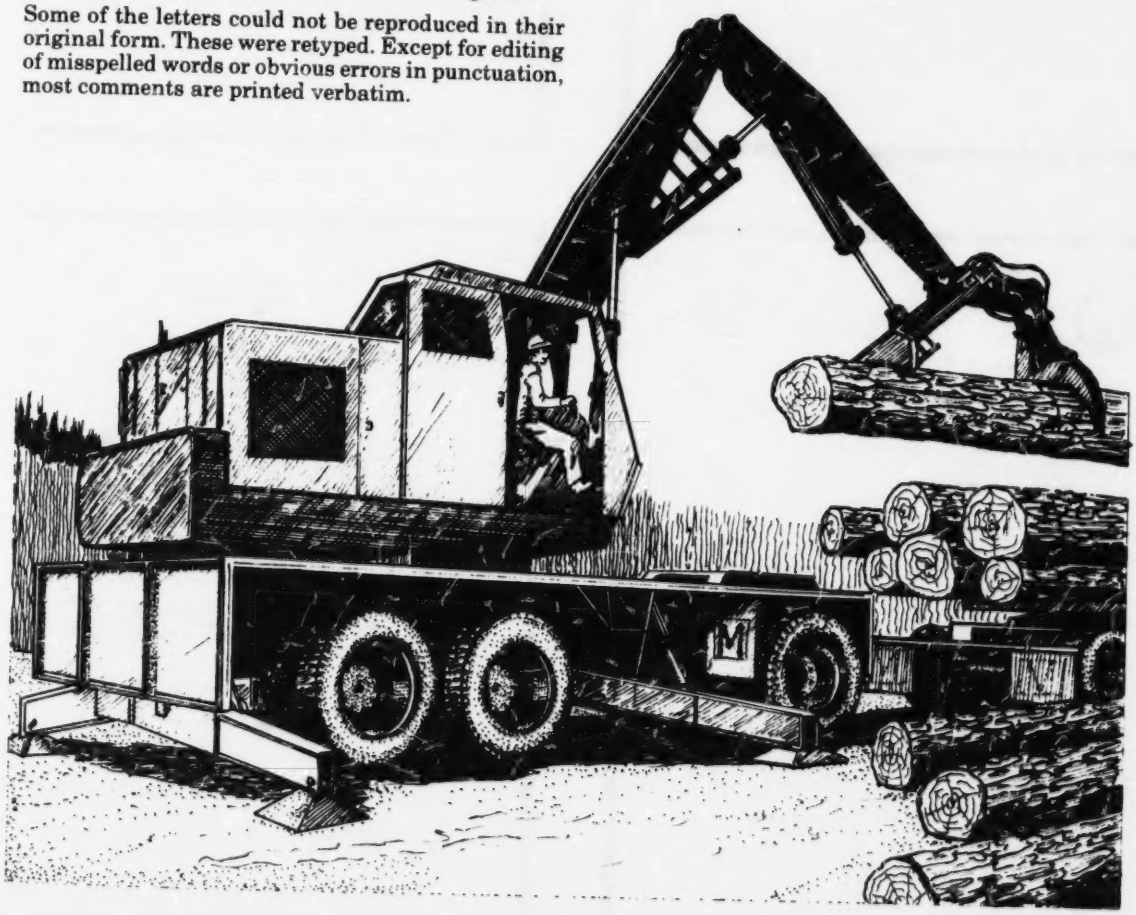
	Identification Number
Federal Agencies	
Environmental Protection Agency, Helena, MT	1
Department of the Air Force, Air Force Regional Civil Engineer, Dallas, TX	2
Department of the Army, Seattle District Corps of Engineers, Seattle, WA	3
Department of Energy, Bonneville Power Administration, Portland, OR	4
Department of the Interior, Fish and Wildlife Service, Helena, MT	5
Department of the Interior, Fish and Wildlife Service, Billings, MT	6
Department of the Interior, Geological Survey, Reston, VA	7
Department of the Interior, National Park Service, Denver, CO	8
State Agencies	
Lubrecht Experimental Forest, Greenough, MT	9
Montana Bureau of Mines and Geology, Butte, MT	10
Montana Department of Fish, Wildlife, and Parks, Region 2, Missoula, MT	11
Montana Historical Society, Historical Preservation Office, Helena, MT	12
State of Montana, Office of the Governor, Helena, MT	13
Businesses	
Atlantic Richfield Company, Denver, CO	14
Bignell Ranch, Helmville, MT	15
Blackfoot River Ranch Inc., Helmville, MT	16
Bonita-Clinton-Potomac Cattle Association, Clinton, MT	17
Champion Timberlands, Milltown, MT	18
Dutton Hereford Ranch, Gold Creek, MT	19
Plum Creek Timber Company, Inc., Missoula, MT	20
Southern California Edison Company, Long Beach, CA	21
Organizations	
Back Country Horsemen, Missoula, MT	22
Five Valley Four Wheelers, Missoula, MT	23
Garnet Preservation Association, Missoula, MT	24
Montana Wilderness Association, Helena, MT	25
National Wildlife Federation Regional Executive, Bozeman, MT	26
Sierra Club, Bitterroot Mission Group, Missoula, MT	27
Individuals	
Donald Aldrich, Missoula, MT	28
Merrill Bradshaw, Jocko, MT	29
Allan Castonguay, Seeley Lake, MT	30
Allen Christophersen, Missoula, MT	31
Bruce Cox, Missoula, MT	32
Barry and Audrey Donnelly, Calgary, Alberta, Canada	33
Frank Fitzgerald, Drummond, MT	34
Doug Habermann, Bozeman, MT	35
Marvin Hammer, Missoula, MT	36
Helen Hammond, Missoula, MT	37
John Hollenback, Gold Creek, MT	38
Charles Kay, Missoula, MT	39
Russell Lawrence, Missoula, MT	40
Ivan Leigland, Missoula, MT	41
Jean Matthews, Missoula, MT	42
Mary Jane Adams Morin, Missoula, MT	43
May Nelson, Drummond, MT	44
Steve Stolp, Helmville, MT	45
Arnold Stoverud, Missoula, MT	Testimony at Public Hearing
Frank Trask, Jr., Deer Lodge, MT	46
Fred Weaver, Clinton, MT	47

alphabetical letter. The response to the bracketed comment will have the same number or alphabetical letter. The numbers refer to responses given to comments which did not require a change in text of the draft. The alphabetical letters refer to responses which resulted in a change in the text of the draft. The responses are arranged by topic in the section titled Responses to Comments and Letters.

PUBLIC COMMENTS ON THE DRAFT RMP/EIS

All comments and the public hearing transcript will be available for inspection at the Garnet Resource Area office in Missoula. In addition, all wilderness comments will accompany the BLM Montana State Director's wilderness recommendations to Washington for consideration by the BLM Director, the Secretary of the Interior, the President, and Congress.

Some of the letters could not be reproduced in their original form. These were retyped. Except for editing of misspelled words or obvious errors in punctuation, most comments are printed verbatim.



1a

United States Environmental Protection Agency
Region 8, Montana Office
Federal Building
301 S. Park, Drawer 10096
Helena, Montana 59626

EPA

Ref: 8MO

January 10, 1985

Mr. Dave Baker
Project Manager
Garnet Resource Area Office
3255 Fort Missoula Road
Missoula, Montana 59801

Dear Mr. Baker:

Thank you for the opportunity to review your Agency's draft environmental impact statement on the Garnet Resource Area Management Plan. Our comments are as follows:

1. We support the improvements in watershed conditions shown under the preferred Alternative E.

A 2. No mention is made in the EIS about BLM's plans for monitoring of water quality. We believe it essential that a monitoring plan be adopted which can be used to gauge the success of the various environmental controls proposed under the preferred alternative.

21 3. It is stated under the Forestry Section for the preferred alternate (p.110) that land adjustment programs could alleviate potential harm to watershed values in certain drainages by reducing scattered ownership. This would be true if the BLM consolidated Federal ownership in a problem drainage and by doing so removed privately held lands from the risk of poor forestry practices. However, land consolidation could also give a watersheds ownership entirely over to private owners who are not constrained by BLM's mandates to protect environmental values.

B 4. The EIS contains little detail on the present environmental situation in the study area. We especially would prefer to see information on current water quality problems and plans to alleviate the problems.

According to EPA's system for rating draft EIS's, this statement is rated LO-2 (lack of objections - insufficient information). This rating means we have no basic objections to the course of action proposed but would prefer a higher level of detail on the current environmental situation in the study area. If you have any questions, please contact Mr. Gene Taylor in our Montana Office at 449-5486 in Helena.

Sincerely,

John F. Wardell, Director
Montana Office

2a

DEPARTMENT OF THE AIR FORCE
AIR FORCE REGIONAL CIVIL ENGINEER CENTRAL REGION (AFESC)
1114 COMMERCE STREET
DALLAS, TEXAS 75242

24 DEC 1984

Dave Baker, Project Manager
Garnet Resource Area Office
3255 Fort Missoula Road
Missoula, Montana 59801

Dear Mr. Baker:

Thank you for allowing us the opportunity to review the Resource Management Plan/Draft Environmental Impact Statement for the Garnet Resource Area, Montana.

We continue to express our support of the Bureau of Land Management in developing functional management plans for lands under its control. The Air Force concern for these management issues contains the need to retain use of existing and the establishment of future military flight training areas and routes which may traverse these areas.

Currently no Air Force air operations cross any portion of the study area. Although flight training areas, routes, and airspace requirements of the military are subject to change and do change frequently, it is not anticipated that new routes will be established in the immediate future.

We are hopeful this information is useful in your planning. If additional information is needed, our staff point of contact is Mr. Raymond Brumbeyer, (214) 767-2514, or FTS 729-2514.

Sincerely,

DON-MICHAEL BANDFORD, Captain, USAF
Director, Environmental Planning Division

Cy to: HQ USAF/LEEV
Maurice LeMove
Acting, State Director
MT State Office
Granite Tower
222 N. 32nd Street
P.O. Box 30157
Billings, MT 59107

3a

DEPARTMENT OF THE ARMY
SEATTLE DISTRICT, CORPS OF ENGINEERS
P.O. BOX C-3755
SEATTLE, WASHINGTON 98124

4 FEB 1985

Planning Branch

David R. Baker, Project Manager
Garnet Resource Area Office
3255 Fort Missoula Road
Missoula, Montana 59801

Dear Mr. Baker:

We have reviewed the draft resource management plan and environmental impact statement for the Garnet Resource Area, Montana, with respect to the U.S. Army Corps of Engineers' areas of responsibility for flood control, navigation, and regulatory functions. We have no comments.

Thank you for the opportunity to review this document.

Sincerely,

GEORGE W. PLOUDRE, P.E.
Asst. Chief, Engineering Division

4a

Department of Energy
Bonneville Power Administration
P.O. Box 3621
Portland, Oregon 97208

[redacted] SJ

March 14, 1985

Mr. Dave Baker, Project Manager
Garnet Resource Area Office
3255 Fort Missoula Road
Missoula Montana 59801

Dear Mr. Baker:

We have reviewed the draft environmental impact statement (EIS) on the Garnet Resource Area and offer the following comments.

The EIS is most comprehensive and does an excellent job of addressing existing as well as potential utility and transportation corridors and energy resources. The Colstrip project corridor has been well referenced on maps as well as in the narrative. We also appreciate the way corridor avoidance and exclusion areas have been addressed. This approach should greatly aid utility corridor planning.

4 Alternative E, the preferred alternative, appears to be a good compromise as to land available for right-of-way, land not available (only 560 acres), and land which is to be avoided. However, we see an important omission in the failure to address hydroelectric resources, both existing and potential, in the energy and mineral resources discussions. If there are no such resources, this should be stated.

Thank you for the opportunity to review the draft EIS. Please contact me if you have any questions.

Sincerely,

Anthony R. Morrell
Environmental Manager

cc:
Earl Reinael - Region 1, USFS
Al Evans - BLM, Billings
John Cheek - PP&L, Portland

5a

UNITED STATES
DEPARTMENT OF THE INTERIOR
FISH AND WILDLIFE SERVICE
Endangered Species, Field Office
Federal Bldg., U.S. Courthouse
301 South Park
P.O. Box 10023
Helena, Montana 59626

IN REPLY REFER TO:
N.02.T.012

March

TO: Project Leader, BLM, Garnet Resource Area, Missoula, MT.

FROM: Field Supervisor, Endangered Species, Helena, MT.

SUBJECT: Biological Assessment for the Garnet Resource Management Plan. (GRMP)

We have reviewed the biological assessment for the GRMP and your determination of "no affect" for the grizzly bear, gray wolf, peregrine falcon, and bald eagle.

We concur with your finding of "no affect" on these Federally listed threatened and endangered speices.

The bald eagle is the listed species most likely to benefit from proposed conservation measures described in the GRMP. We encourage and support your efforts and commitments to monitor this species and protect and enhance riparian habitats and food sources for this species throughout the term of the plan. In addition, we support measures available to you under the land adjustment program to acquire riparian habitats,(especially along the Big Blackfoot River) which may serve as suitable nesting or wintering habitat or which may currently serve as important components of one or more eagle breeding territories.

We are available to you throughout the planning period for planning and carrying out actions directed at the conservation and protection of the listed species and their habitats. We encourage your efforts to monitor for all these species and conduct follow-up surveys in response to sightings of listed species not normally seen in the resource area.

We appreciate your efforts to meet our shared responsibilities to conserve and protect listed species and habitats important to their survival and recovery.

Wayne M. Brunt

6a

UNITED STATES GOVERNMENT

Memorandum

TO : Project Manager, Garnet Resource Area, Missoula, MT DATE: March 13, 1985

FROM : Field Supervisor, USFWS, Billings, MT (ES)

SUBJECT: Review of Draft Garnet Resource Area Management Plan and Draft Environmental Impact Statement

We have reviewed the subject statement and the following constitute the comments of the U.S. Fish and Wildlife Service (FWS). Our comments deal with what we visualize as the most significant resources for fish and wildlife resources, wetland-riparian habitats. Due to our unfamiliarity with the area, we have not commented upon other aspects of fish and wildlife resource issues.

We were pleased to see the emphasis given to riparian habitat in the DEIS. However, we feel that more needs to be done to preserve this extremely valuable habitat. As you know, the BLM, at the national level, has recognized the importance of riparian-wetland habitat, and special emphasis has been given to the protection and enhancement of these areas, in terms of general policy. On February 5, 1980, the BLM published in the Federal Register (Volume 45, No. 25, pages 7889-7895), Final Guidelines; Wetlands-Riparian Area Protection and Management; Policy and Protection Procedures. Therein it is stated that, "Riparian areas which presently or potentially support broad-leaf vegetation in arid and semi-arid ecosystems are of special management concern" (emphasis added). One of the stated objectives is to, "Implement a management system to protect, maintain, and enhance all wetland-riparian areas administered by BLM" (emphasis added). The guidelines further state that BLM policy will be to, "Avoid the long and short-term adverse impacts associated with the destruction, loss, or degradation of wetland-riparian areas"... and, "Preserve and enhance the natural and beneficial values of wetland-riparian areas which may include constraining or excluding those uses that cause significant, long-term ecological damage." Having reviewed the Garnet DEIS, we do not believe that these guidelines have yet been adequately observed. We recommend that during preparation of the Final EIS, more adequate attention be given to wetland-riparian habitat protection needs. According to the draft, there are a total of about 6,100 acres of riparian-wetland habitat within the Garnet Resource Area. Of this total acreage, about 4,800 acres are within areas to be managed under allotment management plans (AMP) and 1,074 acres fall outside of AMP areas. Presently, approximately 4,200 acres of the 4,800 acres of riparian habitat (87%) in the AMP areas are in unsatisfactory condition and 600 acres are satisfactory. Under the preferred alternative, approximately 3,100 acres would improve to satisfactory. We could not find mention of the existing condition of the riparian habitat in the non-AMP areas. Thus,

97

Buy U.S. Savings Bonds Regularly on the Payroll Savings Plan

6b

there will be at least 1,100 acres (4,200 - 3,100) of riparian habitat left in unsatisfactory condition, more if the non-AMP areas contain riparian habitat in unsatisfactory condition. Also, unclear at this point is how the BLM intends to improve 3,100 acres of unsatisfactory condition riparian-wetland habitat to satisfactory condition. The DEIS did not describe the methods that will be employed to achieve this change. To achieve this goal, while at the same time protecting an increase of 5% in licensed of AUMs, seems to us as rather overly optimistic.

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Inasmuch as the total 6,100 acres of riparian habitat represents only 4.2% of the Resource Area, and since it is so important to fish and wildlife resources, we request that you seriously consider raising all riparian-wetland acreage to satisfactory condition. We have similar concerns for the 8 miles of unsurveyed fish producing streams in AMP areas and the remaining 38 miles of fish producing streams outside the AMP areas. We recommend that these 46 miles be surveyed and that any suboptimum stream reaches be upgraded to optimum condition.

We appreciate the opportunity to comment on your RMP/DEIS.

John G. Hood

cc: State Director, BLM, Billings, MT
USFWS/EC, Washington, D.C.
Regional Director, USFWS, Denver, CO (ME)
Field Supervisor, USFWS, Helena, MT (SE)

7a

United States Department of the Interior

GEOLOGICAL SURVEY
RESTON, VA 22092

In Reply Refer To:
WSS-Mail Stop 423

Memorandum

To: Project Manager, Garnet Resource Area Office, Bureau of Land Management, Missoula, Montana

From: Assistant Director for Engineering Geology

Subject: Review of draft environmental statement for Garnet Resource Area management plan, Montana

We have reviewed the draft statement in accord with the cover letter of December, 1984, from the Acting State Director.

1 The draft statement should address the potential for ground-water impacts related to the development of oil, gas, and mineral resources, and should discuss possible mitigation.

J It would be helpful to provide an explanation of the method used to assess mineral potential. For example, the terms that appear under the heading "Potential and Known reserve rating" (Table 3-4) should be defined in the glossary or elsewhere.

James F. Devine

8a

United States Department of the Interior
NATIONAL PARK SERVICE
ROCKY MOUNTAIN REGIONAL OFFICE
655 Parfet Street
P.O. Box 25287
Denver, Colorado 80225

IN REPLY REFER TO

L7619 (RMR-PC)

MAR 7 1985

Memorandum

To: Mr. Dave Baker, Project Manager, Garnet Resource Area Office, Bureau of Land Management, Missoula, Montana

From: Associate Regional Director, Planning and Resource Preservation, Rocky Mountain Region

Subject: Review of draft Garnet Resource Area Resource Management Plan/ Environmental Impact Statement, Butte District, Montana (DES-84/66)

The National Park Service has reviewed the subject plan and environmental impact statement. Generally, our interests are properly addressed in the document. However, we offer two suggestions:

33 1. The document should recognize the existence and contribution of the Grant-Kohrs Ranch National Historic Site at Deer Lodge. We suggest this could be mentioned on pages 59 and 80 under cultural resources.

L 34 2. The discussion of the "Lewis and Clark Trail" on pages 74 and 76 should recognize that Lewis and Clark's route, including this portion along the Blackfoot River, has been designated by the Congress as the Lewis and Clark National Historic Trail. The Garnet resource management plan should be compatible with the comprehensive plan for the national historic trail. A copy of that plan may be obtained from Mr. Tom Gilbert, Midwest Region, National Park Service, 1709 Jackson Street, Omaha, Nebraska 68102, telephone FTS 864-3481.

Richard A. Strait

9a

Lubrecht Experimental Forest
Greenough, MT 59836
March 1, 1985

Mr. Dave Baker
Assistant Area Manager
Garnet Resource Area
3255 Fort Missoula Road
Missoula, Montana 59801

Dear Dave:

This brief letter is in regard to the "Draft Resource Management Plan" for the Garnet Resource Area. I am writing these comments on behalf of myself and two neighboring ranchers, Land Lindbergh of the Lindbergh Cattle Company and Bill Potter of the E-L Ranch.

After a review of the plan and our question and answer session with BLM staff members a few weeks ago, we are satisfied with the preferred alternative E. We agree with the proposed elimination of livestock grazing in the bottom and east side of the Elk Creek drainage. With the intermingled land ownership pattern, the rugged topography, and lack of fencing, efficient livestock management in this area is not practically cost effective. We also concur with eliminating the Wales Creek drainage from formal wilderness classification. Although this area has features that are unique to the Garnet area, the size and general characteristics of the parcel are not conducive to formal wilderness designation. However we also believe, as you have proposed, that special care should be taken in the management of this region to protect the fragile granitic soils and riparian areas. From our experience as land managers and land owners, we favor the flexibility in land management offered by a non wilderness designation.

In closing, we are gratified that the BLM not only undertook this long range planning effort but also that you have been very conscientious in involving adjacent landowners and the general public in the entire process.

Sincerely,

Hank

Hank Goetz
Manager

cc: Land Lindbergh
Bill Potter

10a

MONTANA BUREAU OF MINES AND GEOLOGY
MONTANA COLLEGE OF MINERAL SCIENCE AND TECHNOLOGY
BUTTE, MONTANA 59701

January 21, 1985

Dave Baker, Project Manager
Garnet Resource Area Office
3255 Fort Missoula Road
Missoula, Montana 59801

Dear Mr. Baker:

This letter is a response to the draft Resource Management Plan/ Environmental Impact Statement for the Garnet Resource Area (12/84). Several of the staff members of the Geology and Mineral Resources Division have reviewed portions of this draft which pertain to geology and mineral resources.

D Copies of pages 67 and 71 with reviewer comments are enclosed. Also, it may be appropriate to mention that barite is actively being mined at two localities within this area: 1) the Coloma Creek mine is on BLM land, and 2) the Elk Creek mine is on state land. If we can provide additional information, please let me know.

Sincerely,

Mervin J. Bartholomew, Chief
Geology and Mineral Resources Division

MJB:jd

Enclosures

The Bureau of Mines and Geology was established by law in 1919 as a Department of Montana College of Mineral Science and Technology, to promote efficient development of Montana's mineral resources by gathering and publishing information on the geology, topography, and mineral deposits of this state, including metals, non-metals, coal, oil, gas, and underground water supply.

10b

The comments that follow were transcribed from written comments submitted on copies of pages of the draft RMP/EIS. These comments were enclosed with the letter from the Montana Bureau of Mines and Geology.

On page 67 under Geology

first paragraph:

"The rock types range in age from the late Precambrian Belt series sediments (1 to 2 billion years ago), to the very recent (10 thousand years ago and less)."

E - Belt Supergroup not series as of 1961.
F - 600 to 1600 million years ago instead of 1 to 2 billion years ago.

second paragraph

"Sedimentary rocks such as limestone, argillites, dolomites, quartzites, and shale can be found generally throughout the resource area."

G - should be argillite, dolomite, quartzite, AND sandstone should be included.
7 - Argillite and quartzite are considered metamorphosed (Pettijohn, Sedimentary Rocks)

third paragraph

"Most of the resource area was not directly affected by glacial activity."

H - That statement is not correct. The continental glaciers covered almost half of the area with classic glacial features in the entire northern part of the area. Glacial Lake Missoula covered a large area. Valley glaciers were common in the southern part and certainly in the glacier southern part area.

"However, glacial till can be found in moraines in Fred Burr and Upper Willow creeks."

8 - Why do you single out this area? Moraines are well developed in many other areas.

"In the Drummond area traces of ancient shorelines of glacial Lake Missoula are visible."

9 - Also can be seen in many other parts of your study area.

"Detailed information on the geologic structure of the Garnet Resource Area is contained in two surveys, Morrison-Maierle 1978 and Geo/Resource Consultants, Inc. 1983."

10 - Are these available to public. If so, an address should be provided with references. If they aren't available at this time, they should be made available for the final report.

10c

On page 67 under Oil and Gas

first paragraph

"This landslide is unique because of its size and presence of natural levees."

11 - Do you mean unique in this area?

On page 71 in Table 3-4

12 - What is meant by surface oil and gas potential?

- What is the distinction between Acres of Surface and Acres of Subsurface?

first paragraph under Table 3-4

13 - flourite is misspelled, should be fluorite

second paragraph

"The Madison Limestone Formation . . ."

I - Madison Limestone or Madison Formation, not both

11a

Montana Department of Fish, Wildlife & Parks

3201 Spurgin Road
Missoula, Montana 59801
January 8, 1985

Mr. Darrell Sall
Bureau of Land Management
3255 Fort Missoula Road
Missoula, MT 59801

Dear Darrell:

Following are the considerations of the Region 2 staff concerning the Garnet Resource Area Resource Management Plan/Environmental Impact Statement.

36 Consideration should be given to keeping the wilderness study areas roadless based on the effect of such management on the timber and mineral base. The difference in timber output in the maximum wilderness alternative (c) and the two zero wilderness alternatives (A & B) is 410 mbf/yr and 2600 mbf/yr, respectively. Unless deficit logging is a high priority, putting a little of the area into wilderness would probably save the taxpayers some money as well as benefit wildlife and recreation. The maximum wilderness alternative only reduces lands available for mineral entry by 13.5%, or 27,737 acres. A small price to pay for a little solitude.

52

36

70 You project a 128%+ increase in acres available for grazing, however, AUM's would increase significantly only under Alternative B and would decrease under Alternatives C and D with Alternative E as the preferred, middle-of-the-road choice.

For the above reasons and because fish, wildlife, visuals and outdoor recreation get more consideration under Alternative C, this is the alternative we favor.

R The Department and BLM recently entered a cooperative fisheries management agreement on all BLM lands in Montana. Two of the stated objectives were directed at securing instream flows and protecting species of special concerns. Neither of these areas are addressed with specific plans of action in the current 10-year management plan. Cutthroat trout are found in 47.86 miles of the 67 miles of stream on the GRA. We recommend that goals be established to develop a cooperative plan with our agency to assess the purity of those populations and to develop a management plan for the protection of those populations which prove to be pure strain. A strategy should also be developed for protection of instream flows in the most important streams in the GRA. This might also involve exercising federal reserve water rights.

11b

Mr. Darrell Sall
Page Two
January 8, 1985

99 The final area we feel should be addressed is in the development of economic values of the fisheries, wildlife, and recreation resources on the GRA. Economic values have not been expressed for any of the resources on the GRA and we believe they should be. Three or four jobs are created in timber or mining as a result of this or that alternative, but no mention is made of changes in the job or economic situation of the recreation and service industries. These should be given equal treatment.

Thank you for the opportunity to comment. If you have any questions, feel free to contact us.

Sincerely,

Jim Ford
Regional Supervisor

JF/DW/pm
cc: Ron Marcoux

12a

MONTANA HISTORICAL SOCIETY
HISTORIC PRESERVATION OFFICE
225 NORTH ROBERTS STREET • (406) 444-4584 • HELENA, MONTANA 59620

January 16, 1985

Mr. Dave Baker, Project Manager
Garnet Resource Area Office
3255 Fort Missoula Road
Missoula, MT 59801

Dear Mr. Baker:

Thank you for providing this office with the opportunity to comment on the Draft Garnet Resource Area, Resource Management Plan/EIS. We believe the basic approach for managing cultural resources is sound, but wish to provide you with a few recommendations to strengthen the document.

30 First, we note the assumption during the discussion of alternatives that interpretation of cultural resources is likely to decrease vandalism and other "residual" adverse impacts. While that may be the case if management and interpretation include very frequent patrols or on-site management, other forms of interpretation (general signage and directions, for example) that are not accompanied by active protective, management oversight often result in more rather than less vandalism.

31 Second, the cultural resource management procedures should be presented within the context of Section 106 of the National Historic Preservation Act, as amended, and its implementing regulations, 36CFR800. These establish the regulatory framework for Federal Agencies in the proper consideration of cultural resources, and present the necessary procedures for compliance.

We also believe that the Plan should clarify the evaluation process within this context. While some sites may be evaluated based on surface manifestations, many will require literature and records research and/or subsurface testing in order to evaluate their significance within the context of the National Register of Historic Places criteria (36CFR60.6). The completion of this process is essential to insure that the significant qualities of sites are recognized and receive proper consideration, and to insure that sites which are not significant do not receive unwarranted management considerations. Once the procedures for determining eligibility are completed, a site may be placed in an allocation category. It should be noted that some sites may qualify for more than one category.

Sincerely,

Alan L. Stanfill,
Archaeologist/Anthropologist

13a

State of Montana
Office of the Governor
Helena, Montana 59620

TED SCHWINDEN
GOVERNOR

March 15, 1985

Mr. Dave Baker
Project Manager
Garnet Resource Area Office
1255 Fort Missoula Road
Missoula, MT 59801

Dear Mr. Baker:

The State of Montana appreciates this opportunity to review and comment on the Draft Garnet Resource Area Management Plan (Plan) and Environmental Impact Statement (EIS). Your agency's cooperation and presentation of the Plan to Montana's interagency planning task force is also appreciated. The attached comments reflect the task force's review and concerns regarding the Plan.

In general, provisions have been outlined in the Plan which allow specific activities to be implemented in an environmentally acceptable manner. There are, however, portions of the Plan where the effects of implementation are not clearly identified, and where the lack of quantitative information hinders the comparison of alternative management opportunities.

We hope that the Final Plan and EIS will provide a satisfactory consideration of the state's comments on these draft documents.

Sincerely,

TED SCHWINDEN
Governor

Attachment

13b

State of Montana
Office of the Governor
Helena, Montana 59620

TED SCHWINDEN
GOVERNOR

MONTANA'S COMMENTS ON THE BUREAU OF LAND MANAGEMENT'S DRAFT GARNET RESOURCE AREA MANAGEMENT PLAN AND ENVIRONMENTAL IMPACT STATEMENT

The Garnet Resource Area Management Plan (Plan) is well organized and comprehensive. The Plan's emphasis on qualitative rather than quantitative information, makes it difficult to compare alternatives presented in the Plan. There are additional concerns regarding the effect of the Plan's implementation on water quality, noxious weeds, monitoring programs, wildlife, and grazing. Specific comments on these and other concerns identified by Montana's interagency task force review follow:

Timber.

59 While the 1976 "Environmental Analysis for Timber Management Plan" has apparently formed the basis for the 6.5 MMBF/YR timber sale goal for the Garnet Resource Area (GRA) (page 91), the total commercial forest land base on the GRA has since decreased. As a result, it is unclear on what basis the 9% increase in the harvest rate is proposed by the preferred alternative. The Plan should clarify this rationale.

104 The Timber Production Capability Classification (TPCC) system used on the GRA is based primarily on the physical limitations of the site, while the economics of growing timber is not considered. The economic suitability of commercial timberlands, and the profits of managing for timber on a particular site should be an important consideration in the development of the GRA management plan.

60 While reference is made to the GRA's mandate to provide a sustained yield-even flow of timber, it is not stated whether the proposed cut under the preferred alternative is at, or below the GRA's sustained yield level. This point should be clarified in the Plan.

105 On page 101, 1982 federal payments to Montana counties are listed. How these payments vary by alternative is not identified. It would be helpful if this was included in the Plan.

61 Page 41 of the Plan states that 1,352 acres of commercial forest land (CFL) would be harvested annually. If these lands are exclusive each year, the entire CFL in the GRA would be harvested in 78 years whereas a 100-120 year rotation period is commonly associated with forest plans in Montana. An explanation of the shorter proposed rotation period for the GRA would be appropriate.

69 The proposed timber program and associated road construction, will decrease non-motorized recreation opportunity and big game habitat security. Considering that the demand for this type of recreation is steadily growing, the Plan should contain a commitment to a well enforced road closure program following the completion of logging activities.

13d

Monitoring.

5 Although the Plan commits to preparing specific monitoring plans for the forestry, wildlife, watershed, and range programs, it would be appropriate if the Plan identified target dates for implementation of the monitoring plans. For many of these resources, the existing data base must be strengthened or an adequate data base established, before it can be confirmed that management prescriptions are effective. The development of best management practices (BMPs) should focus on the evaluation of an adequate data base. In addition, the development of monitoring plans should include coordination with adjacent land owners, as well as the Montana Departments of Health and Environmental Sciences (DHES), and Fish, Wildlife and Parks (DFWP). The BLM is encouraged to use the BMPs developed during the 208 Water Quality Program, and proposed guidelines from the Montana Cooperative Elk Logging Study.

Sedimentation and Water Quality.

6 The sediment production projections contained in the Plan, based on the GRA's limited data base, may not be realistic. While the projections may have been made using best available methods, a few suspended sediment measurements are not sufficient to develop long-term sediment load projections. In addition, qualitative water chemistry data should be collected. Less emphasis should be placed on sediment data collection, unless sufficient funding and time to develop a representative sediment sampling program is available.

The Montana DHES has developed the following position statement regarding sediment yield. This position statement is intended to emphasize the importance or implementation of "reasonable" BMPs.

> Increases in sediment yield as a result of land management activities may be in violation of the Montana Water Quality Act, Sections 75-5-303 and 75-5-605, MCA, and the Montana Water Quality Standards, Section 16.20.633 ARM, Subsections 1 d-e and 2. Decisions on the acceptability of predicted increases in sediment yield can be made only on a stream-by-stream basis. Such decisions must take into account the stream's water quality classification, the relative value of the stream's fishery, the predicted loss of fish from the stream, and site-specific best management practices to be used in the stream's watershed. Information concerning the cumulative effects of land management activities on water quality and fish in individual streams should be made available for public inspection. Land, soil, and water conservation practices that do not give adequate protection to water quality and valued fishery resources shall not be considered "reasonable" in the context of Section 75-5-306, MCA, Subsection 2 and Section 16.20.603 ARM, Subsection 11.

C A copy of the BMPs for Silviculture and Roads from the Statewide Water Quality Management Plan: Statewide 108 Water Quality Management Planning Project, October 1979, is enclosed for your information. It would be appropriate to reference these BMPs in the Plan, as they are intended to provide additional information to land managers, and to supplement land management activities.

-3-

13c

Grazing.

81 The preferred alternative plans for a 35% increase in AUM's over the long-term, relying heavily on transitory range created by timber harvest activities. Most of this transitory range, however, is important elk summer-fall range. The final report of the Montana Cooperative Elk-Logging Study, in which BLM participated, concludes "...when previously inaccessible range becomes available to cattle, habitat effectiveness for elk may be seriously impaired." The recommendation also states that "Cattle use of newly logged areas which have been previously used by elk should be discouraged." The preferred alternative does not appear to have taken this recommendation into consideration.

82 Current BLM policy emphasizes the use of a systematic monitoring program to verify the need for livestock adjustments proposed on the basis of one-time inventory data. For example, one-time inventory data from as long ago as 1962 is being used for this purpose by BLM today. To insure appropriate adjustments, the GRA should avoid using one-time inventory data older than 5 years, and should not use data beyond 10 years old.

P Current grazing receipts received by the GRA are only about $10,960 annually. The appropriateness of pursuing $585,000 in range improvements, as proposed by the preferred alternative, should be further explained in the Plan.

Weeds.

84 Although noxious weeds are targeted for control on the GRA, the proposed treatment of the problem is inadequate. The GRA is heavily infested with knapweed, requiring greater emphasis on the development of a long-term chemical and biological treatment program for its control. Without greater awareness and an effort to control the problem, continuing amounts of Animal Unit Months (AUMs) and potential reforestation areas will be adversely affected.

Noxious weed programs should be coordinated with local weed boards, as well as adjacent land owners.

Wildlife.

94 Although important wildlife areas were identified and discussed in the Plan, the only significant committments to wildlife habitat improvement involve timber sales. The Plan should consider additional independent wildlife habitat improvement measures.

Road closures provide significant wildlife security in previously logged areas, but remain only a mitigation measure. Road closures will not completely compensate for losses of wildlife security cover, especially during the hunting season.

95 The Wales Creek, Hoodoo-Galeger and Murray-Douglas areas are extremely important wildlife security areas. Although small non-commercial timber portions of these areas have been protected, timber production and associated roading is planned for many of these important areas. Additional consideration should be given to maintaining more of the existing unroaded wildlife security areas in these locations.

-2-

13e

Mining and Water Quality:

In addition to requirements addressed in the U.S. mining laws, federal agencies are responsible for reporting activites that might affect water quality in the state (ref. Clean Water Act, 1977, Section 401, Title IV, Permits and Licenses, Certification).

Specifically, Section 401(a)(1) states that "...any Applicant for a Federal license or permit for any activity...which may result in a discharge...shall provide the licensing and permitting agency a certification from the State..."

Acceptance of Notice of Intent to Conduct Mining Operations, Plans of Operations or issuance of some Special Use Permits that involve discharges without 401 certification may be in violation of the federal Clean Water Act.

20 With this in mind, we recommend that the BLM require applicants to provide complete documentation that state water quality permits have been secured before accepting their applications for activities on the GRA.

Land Adjustments:

The preferred alternative states that 126,872 acres (87%) of the resource area is to be held in retention for public values, while 18,7888 acres (13%) in available for disposal through exchanges or sales. Several of the tracts identified for disposal are characterized by high wildlife values, primarily elk and deer winter range (WR):

Silver King Ridge Elk WR and Calving Area	280 acres
Montgomery Gulch Elk and Deer WR	120 acres
Mallard Creek Deer WR	40 acres
Lonetree Ridge Elk WR	400 acres
Sluice and Antelope Creek Deer WR	520 acres
Limestone Ridge Deer and Elk WR	160 acres
Gough Creek Deer and Elk WR	40 acres
Pole Creek Elk WR	200 acres
Bear Gulch Deer WR	160 acres
George and Dave Gulch Elk and Deer WR	160 acres
	2080 acres

25 The future disposal of these GRA tracts should be conditional on obtaining lands in exchange that have equal or better wildlife values. Sale of the above tracts should not be considered.

-4-

14a

AtlanticRichfieldCompany

Public Affairs
555 Seventeenth Street
Denver, Colorado 80202
Telephone 303 293 7578

C.M. Moseley
Representative
Rocky Mountain Region

VIA EXPRESS MAIL

March 11, 1985

Mr. Dave Baker
Project Manager
Garnet Resource Area
Bureau of Land Management
3255 Missoula Road
Missoula, MT 59801

Re: Garnet Draft RMP and DEIS

Dear Mr. Baker:

Atlantic Richfield Company would like to offer the following comments on the Draft Resource Management Plan and Draft Environmental Impact Statement for the Garnet Resource Area in northwestern Montana. Atlantic Richfield Company has several thousand State and Federal acres under lease within Missoula, Powell, Lake and Flathead Counties. In addition to our lease acreage, Anaconda Minerals Company, a division of Atlantic Richfield Company, presently has the fee mineral interest in approximately 1,000,000 acres in the counties mentioned above and extending into Sanders and Lincoln counties.

16 We have some concerns with regard to the Table 3-4, page 71 of the planning document, where BLM indicates acreage that is considered to have high, medium, or low potential for energy and minerals within the Garnet RA. Given that the RA is located almost entirely in the Overthrust Belt, we were surprised to find that BLM does not believe that there are any areas with high potential for oil and gas. In April 1982, we submitted energy and mineral evaluations to Mr. Ed Gibale of the Montana BLM State Office. At Mr. Gibale's request, we evaluated Missoula, Powell, and Granite counties for their energy and mineral potential. Our ratings showed that both Powell and Missoula counties, and a

14b

Mr. Dave Baker
March 11, 1985
Page 2

16 portion of Granite county, should be rated a 4 for oil and gas potential, which is the highest possible rating. A copy of the rating forms we submitted are attached for your review. Our geologists indicate that they are still very interested in this part of Montana in terms of exploring for and possibly developing oil and gas. We believe that BLM should upgrade the potential ratings for these areas to reflect our comments. If you feel a discussion of our data is necessary, please call. We would be happy to meet with you.

17 One other major problem we found in the draft planning documents is that the acreage figures used in the various alternative discussions do not add up. For instance, on page xiii under Alternative E, it is stated that oil and gas leasing will be permitted on 205,066 acres; this figure includes the federal mineral estate. Further it is stated that seasonal restrictions will be applied to 84,076 acres and NSO stipulations will be applied to 8,180 acres. The remaining 112,810 acres (which includes the mineral estate) will be subject to standard stipulations. However, Appendix O is misleading because it appears that only 19,617 acres will be subject to special stipulations and that 19,617 acres would be subject to standard stipulations. Therefore, we are confused as to which statement is correct and believe it is essential that this point be clarified in the final document.

18 We support the concept of leasing areas with minimum restrictions. However, we believe that the BLM should include a disclaimer statement in Appendix A, Management Prescriptions, under Management Goals, which points out that if it is found that certain stipulations are not necessary on a site-specific inspection basis, they should be waived. This would avoid potential conflicts in the future if it is determined that exploration could take place in a given area without the special restrictions. For instance, in Management Areas Nos. 5 and 6, it is possible that elk may not return to the same specific area every year. Therefore, if a company plans operations in a area where the elk are not expected to return that year, the seasonal restriction could be lifted for the duration of the drilling operation.

14c

Mr. Dave Baker
March 11, 1985
Page 3

In conclusion, if the recommended modifications and corrections are made to the proposed action, we believe that BLM will have prepared a reasonable Resource Management Plan. We would like more information, however, as to how BLM determined areas of high, medium, and low potential for oil and gas reserves. It is possible that changes should be made with regard to special management area proposals if it is determined that oil and gas potential outweighs those resource values which are being set aside. With the exception of the wilderness recommendation of Quigg, it appears that the entire RA is available for leasing with a minimum of No Surface Occupancy Stipulations. As long as the seasonal stipulations are reasonably applied to allow for an adequate operating window, we can support the BLM's Preferred Alternative.

J 16

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Please feel free to contact us if you would like to discuss our comments in greater detail.

Sincerely,

C. M. Moseley

Enclosures - Rating Forms

15a

Bureau of Land Mgt.

We prefer Alternative E and feel that the additional forage created by forest management practices should be made available for use by the livestock. We do not see the need for any additional areas with so many U.S.F.S. wilderness areas close by.

Bignell Ranch
Helmville, MT

Typed for reproduction in the final EIS

16a

Blackfoot River Ranch Inc.

Kenneth S. Coughlin
Emmett R. Coughlin
Ruby I. Coughlin
Jay Coughlin
Gene Coughlin

Helmville, Montana 59843

March 7, 1985

Bureau of Land Management

Missoula, Montana 59801

Dear Sir,

2 On behalf of the Blackfoot River Ranch Inc. we wish to protest the proposed logging operation up Your Name Creek drainage. We feel this would affect the water shed which we rely on for our flood irrigation.

26 Also the access to Your Name Creek is limited. Private landowners have a written legal agreement which we do activate.

77 In the Blackfoot River Ranch's Five Mile grazing program the present fences maintained by us are adequate to keep cattle out. The fence between BLM and Champion ground is not adequate to keep trespass cattle out.

Sincerely,

Emmett R. Coughlin
President

Gene Coughlin
Vice President

Retyped for improved reproduction in the final EIS

17a

Clinton, Montana
Mar. 11, 1985

David R. Baker, Project Manager
Garnet Resource Area Office
3255 Fort Missoula Road
Missoula, Montana 59801

Dear Sir:

The Bonita, Clinton, Potomac Cattle Association prefers Alternative E from a livestock grazing view. We feel that with proper management by both the Bureau of Land Management and the cattle association, that the projected increase in AUM production should be available in less than the twenty year period, realizing that a lot may depend on monetary funding for range improvements and our capability to help out with installation of some improvements.

As a general comment on this resource management plan, we feel that there is adequate wilderness areas set aside in Western Montana already and can see no need for any additional wilderness areas on Bureau of Land Management ground.

We believe that the timber management has been okay in the past and believe that it sould continue as in the past.

83 The ranchers are concerned about noxfous weeds becoming more of a problem every year and more attention should be given them.

Sincerely,

Bonita, Clinton, Potomac Cattle Association
Bernard J. Weston, Sec. Treas.

Typed for reproduction in the final EIS.

18a

Champion

Mr. Dave Baker
Project Manager
Garnet Resource Area Office
3255 Fort Missoula Road
Missoula, Montana 59801

March 6, 1985

Dear Dave:

Decisions made regarding the present and future management of the Garnet Resource Area are of critical importance to Champion, its employees, and the economy of western Montana. Champion is a major forest landowner in the Garnet area with approximately 120,000 acres within or in close proximity to Bureau of Land Management boundaries. Champion operates two large sawmills, a remanufacturing plant, and a large 300 million square foot per year plywood plant in the Missoula/Bonner area. Champion also operates a 1,900 ton per day pulp mill, located at Frenchtown, which is the only pulp mill in western Montana and requires both mill residuals and pulp logs from a wide geographic area for its continued operation. As a major local employer, we are very concerned about providing a healthful, satisfying and productive working environment for our employees while assuring that federal land managers do a professional job in managing the publically-owned resources entrusted to their care.

I think you and your office did a fine job in preparing the Garnet Resource Area Management Plan. I am sure it was very difficult to put together a long-range plan which addresses many management issues and combines them into a single plan. The summaries of each alternative at the beginning were especially helpful.

55 However, I am concerned over the difference in the allowable cut under Alternative B (emphasizing resource production) and the preferred Alternative E. The 10% annual reduction in volume can only be attributed to the restrictions caused by classifying 62% of the commercial forestland base as special management areas - mainly big game summer and winter range. I agree that the forests in Montana need to be managed with consideration given to wildlife management. However, timber harvesting should be viewed in a positive sense, not as a detriment to big game habitat but as a tool which can be used to improve habitat and populations. Restricted hunting seasons and bag limits are not the only management tools needed to control elk and deer numbers. You have the opportunity to greatly increase big game populations and at the same time increase timber production. Jack Thomas, when writing "Wildlife Habitats in Managed Forests in the Blue Mountains of Oregon

18b

55 and Washington," stated, "It is theoretically possible to produce a 500 percent increase in the ability of the land to produce elk in a totally forested land type." To achieve this it is necessary to convert, through timber harvesting, the forested landscape into 20 percent hiding cover, 20 percent thermal cover, and 60 percent forage areas. Forage areas are the limiting factor to elk production in the totally forested landscape. He goes on to describe how the balance can be reached by both short and long rotations. Thus, I believe you need to increase timber harvesting to obtain the necessary balance of thermal, hiding cover, and forage.

S I agree clearcuts should be kept to a 40-acre maximum size for optimum wildlife management. However, I feel that shelterwood, tree selection, and commercial thinning harvest methods should not be restricted by size, but only by stand geographical and physical characteristics. Large shelterwoods do provide excellent forage, thermal, and hiding cover.

90 The security areas which will be maintained adjacent to timber sales should be put into planned harvest areas as soon as possible. This should be done when the harvested areas have again achieved hiding cover (10 - 15 years).

I also feel that the reserve distance (600') between cutting areas is rather strict. This distance could vary between 100' and 600' with no harmful effect on wildlife.

I encourage you to limit the amount of acres to be allocated to wilderness only to the 500 acres adjacent to the Quigg roadless area. The other wilderness study areas should definitely not be considered for wilderness. Adoption of Alternative C would result in an annual timber volume loss to the forest products industries of 10% from Alternative B and a 15% loss from Alternative E. With the return of these areas to management, productivity of both timber and wildlife will be increased.

56 We also analyzed the growth and yield information used in the derivation of the harvest levels as shown in Table 2-16. All future yields are derived from empirical growth and yield curves constructed from the 1973 inventory data. This approach generally underestimates BF yields in managed stands. Also, the growth and yield equations are stratified by age, harvest regime, and stocking (for partial cut regimes) only. Variation by site quality and species is not accommodated. It is difficult to assess the effects of various restrictions without knowing the production potentials of the acres involved. Certainly not all acres really grow as a lodgepole site index = 44, which is assumed in the simulation runs. A more intensive inventory of the timber resource and estimation of future yields by a modern stand simulator would provide a better basis for guiding management of BLM lands.

18c

In summary, I believe that you should approach timber harvesting with a positive attitude. As managers you must recognize that in order to manage your must be able to manipulate all the resources.

Regards,

Chuck Seeley
Forest Lands Coordinator

klg-CS

19a

David Dutton Dean Dutton

DUTTON HEREFORD RANCH

Registered and Commercial Herefords

Gold Creek, Montana 59733

March 4, 1985

United States Department of Interior
Bureau of Land Management
Garnet Resource Area Office
3255 Fort Missoula Road
Missoula, Montana 59801

Dear Sir:

I think your alternative plan E would be the best approach to the management of the lands.

Sincerely,

David Dutton

Typed for reproduction in the final EIS.

20a

PC PlumCreek Timber Company, Inc.

February 11, 1985

Dave Baker
Project Manager
Garnet Resource Area Office
3255 Fort Missoula Road
Missoula, MT 59801

Dear Mr. Baker:

This is in response to the draft Resource Management Plan/Environmental Impact Statement (draft) for the Garnet Resource Area. As a major private owner and manager of lands within the Garnet Area, PCTC has a significant interest in BLM planning.

22 For the most part, we find that the document supports land exchange and recognizes the benefits derived from consolidated ownership. However, the final could be improved if it displayed a)lands which PCTC desires to discard and b) other lands which PCTC could acquire. Many of our lands within the Garnet Area are scattered and remotely located and are of a resource type that could be managed by BLM or another public agency.

The specific area we wish the Plan to identify as potential acquisition for purchaser exchange includes all of our lands between I-90 and Highway 200, excluding the Bonner Mtn. lands, and including our lands north and northwest of Marcum Mtn. Also, our Chamberlain Mountain lands would be included in this overall land exchange package. Refer to the RMP surface ownership map. There are no BLM lands we wish to acquire within the Garnet Area. Therefore, in order to identify lands we could acquire, we suggest that BLM work with us and other Federal agencies to pursue a multiple-party land exchange.

A consolidated land exchange proposal would comply with BLM's State Guidance document, national legislation and administrative direction. The final Plan should analyze the trade-offs of a blocked up land pattern. Such an analysis would show the benefits and savings to both public and private land managers. Our proposal would also help the BLM meet its land ownership objectives as stated on pages 1-13.

106 We request that the Plan include a statement regarding the limitations of cooperative management. Although we support its intent, cooperative management between public and private landowners is often costly and difficult to implement. This alternative to land exchange should not be considered the final remedy in solving land use conflicts between different land managers and should be stated as such in the final Plan.

K The Plan should also make it clear that access to private lands will not be

20b

Dave Baker
page 2

K restricted or encumbered in any way without coordinating first with the landowner. This applies to all intermingled and adjacent private lands, especially where BLM had designated special use areas. Our comment should be included on page 42-43 of the draft.

We invite you or your representative to further discuss our land exchange proposal. Please select a place and time convenient to you. We support BLM's goal to improve public land management in the Garnet Resource Area, as stated by the State Director, and believe our proposal can contribute toward this goal. Thank you for considering our comments.

Sincerely,

J. A. Barker

JAB/seg

21a

Southern California Edison Company

SCE

P.O. BOX 800
2244 WALNUT GROVE AVENUE
ROSEMEAD, CALIFORNIA 91770

R. J. DULIFF
MANAGER
REAL PROPERTY DEPARTMENT

January 8, 1985

Mr. Dave Baker, Project Manager
Bureau of Land Management
Garnet Resource Area Office
3255 Fort Missoula Road
Missoula, Montana 59801

Dear Mr. Baker:

Subject: Garnet Resource Management Plan/
Environmental Impact Statement (RMP/EIS)-Draft

Southern California Edison Company appreciates the opportunity to comment on the above subject Draft RMP/EIS.

Based on our review and our current information, we have the following comments and recommendations for your consideration.

We are pleased to see the recognition by the planning team of future corridor needs as an issue in the RMP/EIS. Southern California Edison Company and the Western Utility Group (WUG) have identified the existing and future need for planned utility corridors that will meet future energy demands of the eleven Western States through the year 2020. We believe that corridor designation is an important and critical element of land use planning and is an important planning tool for both land managers and the utility industry.

Identification and designation of corridors in the land management planning process will assure maximum public participation insuring that all resource values are identified and considered in their selection. Designated corridors should be of sufficient width to provide the necessary routing flexibility to avoid or mitigate adverse impacts to environmentally sensitive areas located within the corridor.

While Southern California Edison Company has not identified any specific corridor requirement that would affect the Garnet Resource Area, we concur with the designation of Alternative E as being the preferred alternative. We would also agree with any of the remaining alternatives that provides for adequate utilization of utility corridors.

21b

Mr. Dave Baker - 2 - January 8, 1985

Thank you for inviting our comments. We hope you will give them your full consideration in the preparation of the final RMP/EIS. If further details are needed, please contact Mr. J. R. Wilson at (213) 491-2992.

Very truly yours,

JRWilson/1366f/elw

22a

Mr. Dave Baker
Project Manager
Garnet Resource Area Office
3255 Fort Missoula Road
Missoula, Mt. 59801

7 Columbine Road
Missoula, Mt. 59802
March 10, 1985

Dear Mr. Baker:

On behalf of the Issues Committee of the Back Country Horsemen of Missoula, I am submitting this response to you concerning RMP/EIS for the Garnet Resource Area. It was our feeling that the plan is a well prepared, clear and concise document. We found the planning approach useful and easy to understand. Alternative E, the option preferred by the BLM, is generally acceptable to us. There are four particular points which we believe merit further comment.

First, we support the BLM recommendation that only one of the study areas, Quigg West, be considered further for wilderness status. The Wales Creek, Hoodoo Mountain, and Gallagher Creek areas are important roadless tracts which merit protection, but they do not possess wilderness qualities.

32 Secondly, we believe the towns of Garnet and Coloma must continue to be protected for the purposes of both historical preservation and recreational use. We want to compliment the BLM for the level of protection which has existed during the past year. At the same time we would strongly urge that the personnel doing this work not become the first victims of budget reductions in the future.

83 Thirdly, we believe the plan lacks a strong weed control emphasis. While recognizing that weed control is a complicated and expensive business, we believe it represents an important direction that planning and management cannot avoid. Spotted knapweed, leafy spurge, and others represent a very serious threat to these public lands. We believe an active control plan involving various control methods should be considered.

Finally, as backcountry horse users we have problems with fences. Since grazing is an important use of the area, we understand that fences are necessary. We also see them as a factor which often limits the horse use when such a limitation is unnecessary. To solve this problem we urge

78 the BLM to include in the plan a standard that an unlocked gate be included in every fence line at a distance no greater than a one mile interval. In addition a gate should be present on any major trail. We believe this is economically feasible and will allow multiple use.

Thank you for the opportunity to respond to the proposed plan. We would like to be informed of the details of the final version.

Sincerely,

Philip T. Bain

cc: Nancy Chandler, President, 4401 S. Ave. W., Missoula
Jim Archer, Issues Chair, 1230 W. Kent, Missoula
Bill Brown, Issues Chair, 10025 O'Brien Creek Rd., Missoula

Typed for reproduction in the final EIS.

23a

To the attention of the Bureau of Land Management,
Committee for the study of the Resource management Plan and
Environmental Impact Statement;

I am writing in response to the Garnet Resource Area Management Plan.

We are members of the Five Valley Four Wheelers, a recreational organization.

We enjoy traveling the old back country roads, jeep and fire trails and exploring old mine roads and sites.
The roads we are interested in, require little or no maintance, and what repairs are needed could be done by volunteer groups such as ourselves. We could provide erosion control, brush and dead fall removal and non-major repairs, required to keep a jeep road open for 4X4 travel.

The type of road we prefer to travel and enjoy the forests on, are quickly dissapearing from the useable forests. These roads are being destroyed by new logging roads,they are being closed to year long travel, or they are being permanently then allowing the area to be turned into wilderness. We feel there is already enough WILDERNESS in the state of Montana and it is time to consider using some of the lod established jeep trails for the motorized recreation.

User conflict is an expression we hear at almost every meeting we attend and read in most articles that are written concerning forest use. We have little or no conflict with other users because of the time of year we use the area, compared with the time of year others use these areas.

A little common courtesy and mutual respect could solve most conflicts by the useres anyway.

O During the management plan development we would like you to take old roads into consideration when planning a new logging road or other roads. We would like to see the old roads left passable and close the new ones if necessary.

67 A few specific roads we are interested in are: The Cap Wallace Road up to the old ridge road, the to the Chamberlin meadows area via the original road; The Chamberlin Creek Road out to Scotty Brown Bridge, the Road across the burn, The wales Creek Road, The Elevation Mountain Fire Road, Deep Creek Road, Douglas Creek Road down Weasel Gulch to Rattler Gulch.

We want to thank you for your consideration and if you are interested in any of our organization doing any volunteer work on any of the above mentioned roads, feel free to contact either Mike or Kathy Whitman at 728-8033 or write to us at 420 west Central.

Mike Whitman, Pres. Five Valley Four Wheelers
Kathy Whitman, Sec. Five Valley Four Wheelers
420 West Central
Missoula, Montana 59801

24a

Garnet Resource Area
Resource Management Plan

The Garnet Preservation Association supports management alternatives which will preserve, protect, and promote the ghost town.
We feel the town must be stabilized if it is to be publicly presented as a historical site. Our Association's involvement is to provide private funding to this stabilization/preservation goal. Our only real method of raising this funding is through involvement of the general public at the town site.
On this basis we must support Alternatives A or E which provide for access and continued maintenance of this historical resource.

Ivan L. Leigland
President
Garnet Preservation Association

Typed for reproduction in the final EIS.

25a

Written Testimony of Tom Sewell representing the Montana Wilderness Association.

I speak for my personal viewpoint as well as that of M.W.A. At least I assume I am still representing M.W.A. officially.
We support Alternative C, the maximum wilderness alternative, for the Garnet Management Plan.

36 The small areas proposed for wilderness should be so designated simply because they are the only areas suitable on the entire Resource Area. They are so small that there should be no opposition to their protection. The wildlife habitat may be managed by the BLM even if the

37 areas become wilderness. The mineral potential of the areas are low.
The Wales Creek, Meadoe, and Gallagher areas must receive the protection only wilderness can give them.

Thanks,

Tom R. Sewell
M.W.A. Council Member
5131 Koch Ln.
Florence, MT 59833
777-2222

Typed for reproduction in the final EIS.

26a

National Wildlife Federation

12 Gardner Park Dr.
Bozeman, MT. 59715
March 6, 1985

Mr. Dave Baker, Project Manager
Garnet Resource Area Office
Bureau of Land Management
3255 Fort Missoula Road
Missoula, MT. 59801

Dear Mr. Baker:

The National Wildlife Federation takes this opportunity to submit comments on the DEIS of the Garnet Resource Area RMP.
The National Wildlife Federation is the nation's largest private citizens' conservation education organizations with affiliate organizations in all 50 states and two trust territories. The NWF and its state affiliates now have more than 4.5 million members and supporters with a broad spectrum of interest in natural resources and their professional management. The NWF state affiliate in Montana is the Montana Wildlife Federation, with dues-paying members in more than 4,000 Montana households.

P The Federation has reviewed the Garnet RA DEIS in detail and has found a number of areas where the plan needs substantial improvement. As an organization whose members are interested not only in wildlife but in the proper management of all natural resources, the Federation submits the following recommendations. Page references relating to these recommendations will be given where appropriate.
The Bureau's preferred alternative, Page xiii, discusses proper range management, which the Federation certainly supports, but the proposed range improvements fail to make economic sense to us. The cost of the proposed range improvements is $586,000 for a project total of 8,000 AUM's. On Page 102, the plan indicates that the AUM rate in 1984 was 21.37, or about $10,960 from all AUM's per year. This indicates that BLM grazing fees, the only income to BLM produced by the grazing system, returns only a fifth of the cost to the taxpayer of the interest, figured at 10 percent a year, each year. This is hardly cost-effective.

72 The Federation believes the present AUM rate to be unrealistically low and a burden to the taxpayer. A return of less than $11,000 a year on an investment of more than a half-million dollars in range improvements would force any private businessman out of business in short order.

75 The Agency appears to overlook the fact that if the range is in poor condition, which it is, due to over-grazing, the beneficiary of this cheap grazing is being very heavily subsidized at taxpayer expense.

P If the agency is truly concerned about improving the condition of the range, we suggest the first step would be to assess the cost of the range improvements to the permittee who caused the range condition deterioration in the first place. This is not to suggest that the agency is not equally responsible for the poor condition of the range.
Conversely, BLM also estimates on Page 123 that "hunter days" on the Garnet RA generate some $575,241 to the economy in indirect benefits. If wildlife were subsidized at the same rate as grazing on the Garnet RA, this would mean an expenditure in excess of $72 million

103 on wildlife during the period of the plan.
The Federation has interviewed a number of hunters and other

26b

-2-

27 recreationists who use the Garnet RA and we are inclined to believe your "visitor use levels" are low. For instance, the plan estimates that 200 persons visited the Hoodoo Mountain area each year but information given us indicates that more people than that hunted the area in 1964, not counting other recreational users. The same can be stated for the Gallager Creek area where BLM's plan puts the annual public use figure at 100 visitors (Page 269) and our checks with users of that area indicate that more than 40 hunters used that area on the opening day of the 1964 big game season alone.

85 What appears to be the greatest incongruity in the plan is
86 that in one breath, BLM describes some of the elk and deer habitat in the Gallager Creek/Hoodoo Mountains and Wales Creek areas as prime and critical, then apparently refuses to give these wildlife values any real consideration in the proposal. This is particularly disturbing to citizens interested in wildlife and proper resource stewardship; areas described by BLM as "key elk areas" are, a few pages later, scheduled for roading and clear-cutting, practices which can only destroy these same wildlife values.

Q While the Federation strongly supports proper range management, there is little in the plan to suggest that BLM has proper range management in mind.

96 On Page 9 under "livestock grazing," there is no listing of costs of range improvement and the return on the investment. In any economic analysis, this information must be included.

Proper protection of riparian zones is most relevant to the plan's discussion of grazing. Throughout the plan, BLM indicates the riparian areas are in poor condition. BLM's stated solution, voiced several times, is that "intensive grazing management is projected to improve all of the sub-optimum habitat through increased bank stability and cover."

However, there is no mention of excluding cattle from riparian zones by fencing and, since it is not mentioned, we must assume that fencing is not in the proposed plan. Nor is any mention of cutting AUM's to protect riparian habitat. What is left, then? This makes the use of "intensive grazing management" just so much rhetoric.

101 We might also point out that any AUM's allotted are a public, not a private resource. That is to say that the general public has as much right, vested or otherwise, to the public lands as any adjacent landowner. To suggest, as the plan does on Page 231, that because an individual owns private land adjacent to public lands, he has special rights to that public land is philosophically and, probably, legally wrong. If the alternatives are considered by BLM to be in private rather than in public ownership, then such "ownership" constitutes a form of welfare to a privileged minority.

Over-grazing appears to be perpetuated in this plan. However, equally threatening to the values of this public resource are BLM's plans to grossly over-harvest timber on these public lands.

53 There is serious concern on our part that BLM has amassed a long and rather pathetic record on the Garnet RA in its timber management programs. A short drive through and past BLM lands that have been logged of[illegible] very poor regeneration of timber. Has BLM completed any follow-up studies to determine how well logged-over BLM lands in the RA have or actually are reforesting? If BLM is

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-3-

53 using anything other than actual field data on regeneration to estimate regeneration rates as part of its maximum sustained yield allowable timber harvest, then its proposed cutting schedule is faulted before the exercise even begins.

If BLM will realistically assess the regeneration capability and the productivity of its lands scheduled for logging, the cut probably should not exceed 3 million board feet in the next 20 years, not the 6.7 million board feet proposed.

100 According to information on Page 91, BLM has sold 229,529 million board feet of timber since 1944 for a total price of $4,772,988, or about $21 per million board feet. BLM also states that it plans to harvest 6,700,000 board feet per year.

If the same average prices prevail over the 20-year cut period, this would mean about $136,500 per year in timber receipts.

On Page 125, BLM's plan states that hunter days on these same BLM lands were worth nearly $799,500 per year, plus almost $575,241 in other income generated to the economy in incidental benefits.

76 While the impacts of increasing cattle grazing by some 28 percent on areas already badly over-grazed, under the preferred alternative, make little sense from an economic standpoint, the increase of 637 AUM's called for in the token environmental alternative is just as ludicrous.

We have separated logging from roading in the discussion up to this point because we want to focus attention on two large BLM units called the Gallager Creek/Hoodoo Mountain area and the Wales Creek area. Both these areas have been described in the plan as key elk areas and both have been classified, to date, as primitive areas.

These are the only remaining Garnet Mountains units within the Garnet RA which are large and which contain critical wildlife habitat. Both are heavily used by hunters from Missoula and Helena as well as other Montanans engaged in other forms of outdoor recreation. As such, they are an important public resource if they remain in their current condition.

100 Clearly, from BLM's own figures, wildlife and hunting gener-
103 ate more income to the public than does timber harvest and grazing in the Garnet RA, at least on publicly-owned lands. A strong case can be made that the plan is not economically sound from the grazing and logging standpoint. It can also be argued that should BLM manage these lands under agency control in this RA which still contain good wildlife habitat for wildlife, not logging and grazing, and produce more public benefits. Thus, the entire thrust of the plan needs revision.

Under "management guidelines" on Page 175 (Item No. 1), it

73 is clearly demonstrated that big game should be given priority on all ranges, based on BLM's own analysis. It follows that livestock grazing should be removed from all big game winter ranges.

As previously stated, our reading of the plan shows that

42 BLM intends to heavily log the two larger units. This will ultimately destroy all of their unique wildlife values, and these are public values on publicly-owned lands. One of the reasons they have retained a high value for wildlife is that they are largely unroaded. Under the proposed plan, the only areas to be left unroaded are those with little timber potential and little value to wildlife. The plan calls for, in fact, the ultimate destruction of all of the significant wildlife values. It also demonstrates that the plan's authors had little concern for and

26d

-4-

42 gave no consideration to protecting those public values.

The plan calls for the construction of 210 miles of logging roads over the next 20 years just in these two units. The planned intrusion will completely destroy the elk hunting values thereon.

The Federation cannot see how it will be possible for BLM to adhere to the Cooperative Elk/Logging Study (BLM-USFS-F&GP) guidelines while building 210 miles of logging roads into these areas to cut the projected 134 million board feet of timber.

39 The treatment accorded wilderness study, a mandated responsibility of BLM and other federal land management agencies, is shabby at best. In addition to removing these two areas from wilderness study status, the plan calls for roading and logging them, automatically negating any further consideration for protection. The wilderness study areas should remain in their present status until the Congress decides on their future.

43 BLM's "throw-away" to its mandated wilderness responsibility is one 520-acre parcel which virtually is all talus slopes and scree hillsides, with low wildlife values. The same mindset apparently applies in BLM's proposal for the upper Gallager Creek area where the only portion to be left uncut is an area of rock slides.

40 The Federation has difficulty with Pages 291-300. The method of presentation is deceptive. The listing indicates that all wilderness study areas on the list are going to be added to the wilderness system. This is anything but the case.

To handle this subject more objectively, BLM should list the total number, size and location of wilderness study areas, the total agency recommendations for wilderness, the total acreage of federal lands in Montana and the total acreage of all lands in Montana. The percentage of wilderness existing and proposed should be calculated for the entire state, not just the federal lands therein.

41 The table (P-8) on Page 299 is adequate but we suggest deleting the National Park Service wilderness areas. These lands already are in national park classification and not subject to development or resource extraction. Thus, they really are not part of a full wilderness discussion. We also recommend that Forest Service recommendations be included in such tabulations as soon as their forest plans become public in the near future.

N In connection with the roading issue, the plan's errata on
M Page 327 (reference to Chapter 3, Page 68) recommends that listings under vehicle roadways on the Page 68 map be changed to foot trails. This change also should apply to Pages 30, 39, 257 and 268. There are no roads in the Gallager wilderness study area.

25 Under the section on land adjustment, the Federation is completely familiar with this BLM program and all of its ramifications. Under the plan, many parcels of land are scheduled for sale or trade which have high wildlife values. These include:

Beacon Area - 120 acres - high in value for elk and deer winter range, with more than 500 elk using the area extensively. S8,T9N,R8W.
George Gulch - 40 acres - High-use elk and deer winter range. S14,T9N, R9W.
Bear Gulch - 160 acres - high value deer winter range. S24,T10N,R9W.
Pole Creek - 200 acres - more than 100 elk use this winter range. S11 & 13, T12N, R11W.
Gough Creek - 40 acres - Good elk, deer winter range. S14, T10N,R11W.
Limestone Ridge - 160 acres - Elk, deer winter range. S22, T11N,R12W.

26e

-5-

25 Sluice Creek and Antelope Creek - 520 acres - all of this area is good deer winter range. S4,5&8, T6N, R15W.

Lone Tree Ridge - 400 acres total - more than 100 elk use this area as prime winter range. S30, 31, T5N, R15W.

Montgomery Gulch - 120 acres - elk, deer winter range. S6, T6N, R15W.

Silver King Ridge - 280 acres - elk calving and winter range, with 500 elk using it. S20, T9N, R14W.

The Federation would not object to trading these lands for "blocking" purposes but only if the lands to be acquired had substantially greater wildlife values. Failing to negotiate a trade under these conditions, BLM should follow the State Director Guidance priorities and transfer title to the Montana Department of Fish, Wildlife and Parks.

88 It is obvious to anyone knowledgeable about wildlife to note that most of the non-BLM lands in the Garnet RA which had timber at one time now have severely reduced wildlife values. Lands owned by the Champion Corporation and Burlington-Northern and those managed by the Department of State Lands have, in almost every case, been clear-cut. Other privately-owned lands are, in most instances, over-grazed. BLM retains the relatively few areas in this BLM resource area that still contain moderate to high wildlife values. Thus the direction BLM takes with its management of the agency's holdings in this resource area will determine the future of the area's wildlife resource.

The National Wildlife Federation requests the Bureau of Land Management to specifically address each of the points raised in these comments and to take action in the preparation of the final EIS on the Garnet RA accordingly.

Please keep us informed of your actions.

Sincerely,

Charles J. Griffith

Charles J. Griffith
NWF Regional Executive
No. Rockies Region

27a

BITTERROOT-MISSION GROUP
SIERRA CLUB
BOX 7315 MISSOULA, MONTANA 59807
March 13,1985

Mr. Dave Baker
Project Manager
Garnet Resource Area Office
3255 Fort Missoula Road
Missoula, MT 59801

Dear Mr. Baker:

The Bitterroot-Mission Group of the Sierra Club wishes to express sincere thanks for this opportunity to comment on the Draft Garnet Resource Management Plan and to submit the following comments.

We were impressed with the thoroughness of the analysis and the balanced presentation of issues that we found in the RMP. Nevertheless, we find it necessary to disagree with certain conclusions. For the most part our disagreements stem from differences in judgement concerning the weight that should be placed on certain resource values and the importance of these to the public.

Specifically, we cannot agree with the choice of Alternative E as the preferred alternative, because we do not believe that it gives sufficient importance to the important resource values of wilderness and wildlife habitat.

Concerning wilderness we would like to make the following points:

49 1. Surveys show that the public demand for wilderness and the opportunity for primitive recreation in wilderness is increasing more rapidly than was expected only a few years ago. As a consequence many wilderness areas are being very heavily used. For example, the Lewis and Clark Forest reports that there were 69,900 days of wilderness recreation use in the Rocky Mountain Division of the Forest last year, although in 1981 it had been estimated that the wilderness areas in the Division could handle only 47,000 days of wilderness recreation per year. We do not believe that the increased public demand for wilderness recreation was adequately recognized in the draft RMP.

"Not blind opposition to progress, but opposition to blind progress."

27b

2. Relatively small wilderness areas, such as Ninemile Creek, Meadow Mountain and Gallagher Creek will become increasingly important as the usage of the larger and longer established areas continues to increase. These areas will provide opportunity for solitude that it will be harder and harder to find in the more heavily used areas.

50 3. We do not believe that the fact, as stated in Appendix Q, that "there is no need to designate these BLM study areas as wilderness solely to balance ecotype diversity" is a valid argument against wilderness designation. There are many wilderness values. Preservation of a balance and diversity of ecosystems is only one, although we deem it an important one.

37 4. We do not believe that the establishment of special management areas provides adequate protection of wilderness values, primarily because such administrative designation carries no guarantee of permanence. The only method for assuring permanent protection of the wilderness resource is statutory designation.

44 5. It is well recognized in the draft RMP that management that would allow the surface character of the WSAs to be disturbed would result in irreversible degradation of their wilderness qualities. We do not believe that the short term benefits that might be realized by thus degrading the wilderness resource are sufficient to justify the long term loss of a lasting and irreplaceable resource that will become increasingly precious with the passage of time.

51 6. Finally, we do not believe that the fact that there are large designated wilderness areas in western Montana relatively close to population centers is in any way relevant to an evaluation of the wilderness qualities of the BLM WSAs. These areas are not the property of Missoula or Great Falls residents, nor are they the property of the state of Montana. They are part of the federally owned public domain and belong to all citizens of the United States. The fact that they are located in Montana is incidental and irrelevant.

Concerning the impacts of the Preferred Alternative on wildlife we would like to make the following points:

92 1. Western Montana is a unique area that enjoys a special life style in large part because of its rich resource of wildlife. Thousands of present day Montanans took up residence here in order to enjoy this abundance of wildlife by hunting and fishing, wildlife photography, or simply viewing and observing when they go afield. Additional thousands visit Montana each year in large part because of this special attraction. Any action that tends to diminish this unique wildlife resource degrades Montana and should not be taken unless there is a compelling reason that dictates such action. We do not find such compelling reason demonstrated in the draft RMP.

27c

93 2. THE SUMMARY OF THE IMPACTS OF THE ALTERNATIVES ON RESOURCES, page 112, states that Alternative E will result in serious long-term adverse impacts on wildlife on 27,040 acres. We do not believe that such action is in the best interests of Montana or the United States. The meager amount of consumptive resources that might be produced by the proposed development actions is not sufficient compensation for such long-term degradation of the precious wildlife resource.

68 3. Chapter 3 of the draft RMP appropriately recognizes the importance of the Recreation Resource provided in the Garnet Resource Area and makes special mention of the Blackfoot Special Management Area and that total of 104,140 acres of cooperatively managed walk-in areas. The value of these areas depends in very large part on the opportunity provided to enjoy the wildlife resource found there. The fact that the major concentrations of BLM administered public land is adjacent to these walk-in areas places a special responsibility on the BLM to maintain and enhance this wildlife resource. In our view, this responsibility is not adequately recognized by any of the five Alternatives. Even Alternative C provides for management activities that would have serious long-term adverse impacts on fish and wildlife on 22,400 acres. We recognize that management would seek to improve wildlife habitat on substantial acreages due to intensive grazing management and management as wilderness. Nevertheless, it appears that the net result is certain to be a reduction in the wildlife resource.

Preference among Alternatives

Of the five Alternatives presented we would have to choose Alternative C, the Protection Alternative. However, we do not find it entirely acceptable, because of the net adverse impacts on wildlife as discussed above.

We hope that in revising the draft RMP a greater emphasis can be placed on wildlife which we believe to be the most important resource to be found on these publicly owned lands, and that an appropriate management alternative that will recognize the important value of the wildlife resource can be developed.

27d

We trust that these comments will be given serious consideration. They are offered in the spirit of constructive criticism in an attempt to represent what we perceive as the best interests of both Montanans and United States citizens wherever they may live.

Sincerely yours,

John F. Curtis
Group Chair

28a

March 10, 1985

Dave Baker
Garnet Resource Area Office
Bureau of Land Management
3255 Fort Missoula Rd.
Missoula, MT 59801

Dear Dave:

I wish to make the following comments on the Resource Management Plan for the Garnet Resource Area:

Alternative "E" is a reasonable Multiple Use proposal.

The process for determining management areas and the criteria for managing each is commendable.

I do not have on-the-ground knowledge of the lands in the Garnet Resource Area so cannot comment on your management area allocations but do approve the process and believe it will provide concerned individuals a means of monitoring management. The integrity of the plan will be known when we see it implemented.

Thank you for the opportunity to review the R.M.P. Staffs cooperation is appreciated.

Sincerely,

Donald Allerich
Donald Allerich
410 Woodworth
Missoula, MT 59801

29a

Greetings

44 Regarding the Garnet Resource Area, 10 year management plan.

Upon my initial study, a large portion concerns wilderness recommendations. Unfortunately I find your terminology generally negative towards this concept. Throughout the plan "wilderness" is seen as a detriment to development. What you haven't gone into enough is how logging, gas, oil, and mineral consumption have been and will be degrading to wildlands, people, animals, plants, air, and water. This country was mostly "wild" up until the turn of the century. Continued, radical, degradation of ecosystems will ensure the destruction of the biosphere. Let's face it; without long-term (200 plus years) considerations, this planet is going to die. Our planetary resources are finite.

Since the BLM is determined to design a plan for the next 10 years, I have some recommendations.

65 1. Wales Creek, Hoodoo Mt., Gallagher Creek, and Quig West should be designated "wilderness", as well as all roadless areas in this state. The road between Hoodoo Mt. WSA and Wales Creek WSA should be eliminated. Roads bring weeds, and decrease elk populations due to hunting pressures and overkill. According to the Montana Dept. of Fish, Wildlife, and Parks, ". . . 60 to 80 percent of the elk population will decrease if the "roadless areas" of the state are roaded".

Large ecosystems must be protected so all wild species have the opportunity to survive and migrate. Why not enhance areas for the reintroduction of past animals?

Bring back the grizzly!

Even though there seems to be a large supply of wilderness in the GRA (your opinion), more will benefit the growing populations.

1980 - 86,000
2005 - 147,000

Nonpolluting - low impact industries such as recreation, hunting, fishing, and outfitting, etc. brings a lot of direct and indirect revenue into this state. Tourism (people oriented) is the type expansion that I consider acceptable. Habitat protection and access are concerns raised by conservationists, as well as recreationists.

72 2. Grazing should be reduced overall for several reasons.
a. It's another subsidy by the government (tax payers).
b. Cows and sheep compact soil and eat plants down to stubble which doesn't allow for complete regeneration; too much, and we have desert.

3. If existing commercial forests are managed properly; thinning, select cuts, and regeneration (natural or hand plant), there is no need for opening up more forest lands. There are approximately 12 million acres of "commercial forests" in Montana. Sustained yield can work, if the "greed factor" of the timber industry would abate. Right now there is an over supply of timber logs throughout the northwest at the mills. In other words the timber market is slower than the past . . . flooded.

29b

66 Select cutting of small blocks with temporary roads and/or sky lines, and helicopters should be used. Access and rehabilitation (planting) must be paid for by the logging contractors in full. No more timber deficits! Again, the fewer vehicles, the less transport of weeds (no spray).

1 4. Oil and gas exploration and development cause more in immediate
44 and direct pollution from heavy machinery, spills, and pipelines next to open pit mining. Again, the market is flooded. Prudhoe Bay oil/gas is exported. Our domestic uses have tapered. We may need some 200 years down the road. These resources are finite.

Animals and water quality are usually disturbed, prime grizzly habitat is now being threatened near Holl Creek. Seismic blasting pushes deer, elk, bear, etc. away from their traditional rangelands. Pristine water from existing "wilderness" areas will become polluted from runoff and "minor" spills, whom developed on boundaries, (Rocky Mt. Front). The list goes on. "Buffers" from development should be established.

19 5. Mineral exploration usually ruins most areas with the use of
mills, tailings, heavy metals, and truck traffic, the impact of this activity in most cases is destructive. "Boom and bust" mentality prevails when it comes to this industry. Promises of short lived economic benefits are not beneficial. The Troy mine (state-of-the-art) is a prime example. Any mining activity should be viewed with caution, EIS's, and many public hearings. Again, animal and water, and air will suffer for many generations if large mines are opened. Reclamation does not repair the damage of displaced animals and people's well-being.

Conclusions

44 The main problem with our society is the notion of consumption. Resources are either nonrenewable (oil, gas, mining) or slow to regenerate (forestry). Our planet is at a point when it is necessary to look 200 years ahead. The "boom and bust" mentality has to be replaced with respect to future generations.

Wilderness promotes multiple use in all aspects; from recreation for all of us to inspiration and low impact industries.

Wildlands help us regain our ancestral ties to the land. They have their own value; some call it "intrinsic". There is too little of it left, 3 percent in Montana (less in the continental 48).

Moderating industrial development will ensure a steady supply of resources for the future. "Wilderness" and roadless areas are the last remaining vestiges of ecological sanity. We as a world population must look at the big picture, and ask if we can continue at our present rate of resource consumption. Remember, you are working for us!

Sincerely,

Merrill Bradshaw
Black Sheep Ranch
520 Agency Rd.
Jocko, MT 59821

Typed for reproduction in the final EIS.

30a

Feb 25, 85

Dave Baker, Project Manager
Garnet Resource Area Office

I have looked over your Resource Plan for the Garnet Area. I like to
62 know what is and I feel that Alternative E is the best Proposal I have read. I also feel that the Carmel Barge Road should be Kept Closed during the winter and the Cabin at Greenough Hill be locked during the Winter

Yours
Allen Cartagena
P.O. Box 463
Darby Lake Montana

31a March 7, 1985

Comments on the Garnet Draft Resource Management Plan:

1. Outfitter and guide permits. I concur with the recommendation of not issuing any permits for the area. The land base is relatively small, fairly accessible, and a fair number of people hunt the Garnets already. There does not appear to be any reason for permitting an outfitter to operate in this area.

107 2. I believe there needs to be a stronger recognition of the ecological systems at work in the Garnet Range. As in most of Western Montana this area developed through both frequent, low intensity fires and catastrophic fires. Except for only a couple of MA's, the use of fire is not spoken to. Use of fire to stimulate browse and basically keep the vegetation from losing vigor should be addressed in most MA's except maybe the riparian areas. The wildlife areas (MA4,6) should have fire used and used extensively to maintain or enhance wildlife values.

54 3. The Garnets have been a perpetual haven for spruce budworm for at least the last 4-5 decades. Much of this can be attributed to fire suppression and subsequent heavy understory stocking of susceptible species (DF, AF). Anytime timber harvest occurs it should be designed to move away from these species to the extent ecologically possible.

3 4. Within MA 1, protection of the stream bank for stability purposes should be paramount. The stability of the streambanks can have long reaching effects on timber harvesting upstream.

64 5. Road closures. With the access that is presently available throughout the Garnets it seems that there should be a very strong stand taken on future roading and re-analyzing present roads for closure. The addition of all new roads should be set up for closure, especially during hunting seasons. Many should be closed year round. Closures would serve two purposes, 1) to reduce wear and tear on the roads, especially the local logging roads, and 2) to provide the isolation security that the big game needs.

The amount of open roads in the Ring Mountain area is a real scary situation if it was to be on areas any larger. There is tremendous hunting pressure in this area, mostly by driving roads, but it allows for very little security area for big game. Many of these roads should be closed, especially during hunting season.

89 6. In MA 6 the security cover is described as 200 trees/acre, 8' tall. It seems rather difficult to apply one standard to all situations. Does the criteria fit areas that are on 50-60 percent slopes when viewed from across the drainage? Maybe it would be better to just say provide security cover and let the biologists evaluate individual sites as to their meeting those objectives.

108 7. I am encouraged to see your proposal to use herbicides for site preparation. In the areas of the Garnets pinegrass is a very strong vegetative competitor and must be dealt with decisively to achieve appropriate conifer regeneration. The use of herbicides is a viable tool and I encourage you to pursue their use when needed.

Allen Christophersen

Allen Christophersen
1 Virginia Drive
Missoula, MT 59803

32a

P.O. Box 7911
Missoula, MT 59807
7 March, 1985

Dave Baker
Project Manager
BLM Garnet Resource Area Office
3255 Fort Missoula Road
Missoula, Montana 59801

Dear Mr. Baker:

Thank you for the opportunity to review the Draft RMP/EIS for the Garnet Resource Area. I have studied the Draft document and support your preferred Alternative E for resource management. Alternative E should provide a balanced resource management objective for the various management areas.

I am glad to see that your geology/mineral resources data base has been greatly expanded in recent years and that this information has been carefully considered. Although the historic mining districts have been the focus of mining activity, it is likely that mineral resource discoveries can be made in other areas of BLM land. Discoveries will occur in response to market demands and technologic advancements in exploration and mining. It is important, therefor, to maintain a substantial multiple use land base in which such discoveries and mining can occur.

I look forward to reviewing the RMP/EIS final document.

Sincerely,

Bruce E. Cox
Geologist

33a

February 28th, 1985

Mr. Dave Baker,
Project Manager,
Garnet Resource Area Office,
3255 Fort Missoula Road,
Missoula, Montana. 59801

Dear Mr. Baker:

Re: RMP/EIS for Garnet Resource Area.

As recent as two weeks ago, a group of nine Canadians enjoyed a nine day vacation snowmobiling in the Seeley Lake area, returning for the fourth year. Each year we had heard stories about the supberb snowmobiling in the Garnet Range of mountains. Finally this year six of our group made the trip into the area and spent a day snowmobiling the many excellent trails in the area. Of course and additional bonus for us was the opportunity to visit the old Ghost town of Garnet - a most interesting and worthwhile restoration project.

28 Upon a quick study of the draft re the above, we would like at this time to register our favorable opinion towards the Preferred Alternative E which appears to be a multi-use Plan. However, we would not like to see the snowmobiling opportunities in the Garnet Area decreased in anyway.

Thank you for your attention and to the betterment of snowmobiling, we remain,

Yours truly,

Barry & Audrey Donnelly

Barry and Audrey Donnelly
512 - 64 Avenue, N.W.
Calgary, Alberta, Canada
T2K 0M2

34a

Box 220
Drummond, Montana 59832

8 March 1985

Darrel Hall, Area Manager
Garnet Resource Area Office
3255 Fort Missoula Road
Missoula, Montana 59801

Dear Mr. Hall:

32 In regard to the Garnet Resource Management plan, I'll go along with Alternative E, but I do not think there is enough emphasis on the protection of the town of Garnet.

Why I strongly urge the necessity of a full-time guard? As of now, we're on the shaky ground of funding for six months, with the possibility of the Garnet Preservation Association paying for the rest of the time. The GPA does not now raise enough funds to pay a guard adequately, and I do not see how this situation will change in the future. Leaving Garnet without a guard for six months is similar to a bank which has its doors and vault locked half the time.

You people at the Bureau of Land Management in Missoula have been most helpful in the past. I am optimistic that you will continue to be so in the future.

Thank you very much.

Sincerely,

Frank J. Fitzgerald

35a

Mr. Dave Baker
Garnet Resource Area
3255 Fort Missoula Road
Missoula, Mont. 59801

3-13-85

Dear Dave, et al.:

Thank you for the opportunity to comment on the GRA RMP. I know how much time and effort went into the document and I support most of the preferred alternative. I would like to submit the following comments as a concerned private citizen.

79 First of all, I believe that in Management Area 11, no grazing should be allowed. (1) This is a very small amount of land and its withdrawal would not affect AUMs significantly on any one lease. (2) Cattle destroy cultural sites, both physically by knocking down cabins, etc., and visually by their presence and "leavings". (3) Cabins, mine shafts, and other historic sites present a hazard to cattle. Historic sites should either be fenced or no grazing should be allowed around them. This is particularly true of Garnet and the other major mining ghost towns (i.e., Reynolds City).

57 Secondly, exactly where did the timber base data (CFL) come from? During what years did the foresters inventory the timber base? The Garnets have very slow-growing trees and I believe that 7,030 mbf is not a sustainable yearly harvest in the Garnets. Harvesting at this level would remove old-growth and push the entire resource area towards single-age stands. I also believe that more emphasis must be placed on post-sale regeneration, slash removal, and closing of roads. Clean up the old mistakes and problem areas before new ones are created.

35 I also firmly believe that all of the Anderson Mountain west face above the Moore cabins and north face above the Mountain View Mill Road should be in Management Area 11. Clear-cuts on Anderson Mountain have already destroyed numerous historic sites and the archaeological survey for the proposed timber sales on Anderson Mountain was inadequate. From personal experience, I know of many sites not even mentioned in the archaeological report that would be lost if timber sales proceed as planned. Anderson Mountain and the activities on it were an integral part of Garnet's history and will become an important cultural and recreation resource if left intact. Anderson Mountain has many hiking and cross-country ski opportunities that should be protected. The timber values are not high enough to justify removal of the timber particularly
58 on the upper mountain. Any timber cutting any where near Garnet should take into consideration telemark and trail cross-country skiing possibilities and visual resources. Require loggers to provide skiable slopes by removing or reducing in height stumps and slash.

35b

I strongly support cultural and recreation resource management as
32 outlined in the preferred alternative. Continued funding for Garnet Ghost Town, the Blackfoot and Clark Fork rivers management, and trails and walk-in hunting area management is essential to probably the most valuable resource in the Garnets over the long run. This should continue to be recognized in management of the GRA.

I object strongly to recommending almost the entire amount of WSAs be
45 dropped from wilderness consideration. I feel that it is inconsistent to list old-growth timber as a reason for nonwilderness classification. This type of area is not presently "well-represented" in the NWPS and the WSAs in the area would be excellent for changing this.

46 Wales Creek. This is an area that would be an excellent addition to the NWPS. Many other people feel this same way as shown by the substantial pro-wilderness public comment received when it became a WSA. I disagree that the roads into the area effect the naturalness of the area - you can get away from the roads and experience a pristine experience. In fact, you could even get lost there! As far as minerals go, if there were any valid and mineable deposits there, the area would not be as untouched as it is now.

47 Gallagher Creek. This is a beautiful area with marginal timber resources when you consider the road building costs associated with accessing the old-growth timber. In particular, Hannix Park and the wilderness and wildlife values associated with it can only be protected by formal designation. I object to any use of recreation benefits derived from road building being used to justify the road building in this or any other area in the Garnets. There is an over abundance of roaded recreation opportunities in the Garnets.

Hoodoo Mountain. Another area where wilderness designation would be best to protect the unique values of the area. Upper Cottonwood Creek is as wild as an area you can find and should be wilderness.

48 Once again, I believe it is inconsistent with FLPMA and the Multiple Use Act to violate pristine areas such as Wales Creek, Gallagher Creek, and Hoodoo Mountain by roading and logging marginal timber areas. There is a lack of substantial mineral resources in these areas and public comment supports recommending these areas, especially Wales Creek, for wilderness designation. I heartily endorse your recommendation that Quigg West be designated wilderness.

35c

Finally, I support fully funded land management practices as put forth in Appendix 8, "Best Management Practices". The GRA has well-qualified foresters who should stipulate that these practices be part of all contracts. Funding should be sufficient to allow for responsible timber sale layout and monitoring and site preparation and replanting after the sales.

Thanks again,

Doug Habermann
2629 West Babcock
Bozeman, MT 59715

Typed for reproduction in the final EIS.

36a

DAVE BAKER -PROJECT MANAGER
GARNET RESOURCE AREA OFFICE
3225 FORT MISSOULA,MONTANA 59801

DEAR DAVE,

AFTER REVIEWING THE BLM GARNET AREA MANAGEMENT PROPOSAL,I WOULD LIKE TO MAKE A FEW COMMENTS.

AS A SNOWMOBILER AND A CROSS COUNTRY SKIER, I CAN APPRECIATE THE VAST AREAS THAT WE HAVE TO ENJOY THESE SPORTS ON BLM LAND.

I AM IN FAVOR OF USING ALL PUBLIC LANDS FOR LIVESTOCK GRAZING AND COMMERCIAL TIMBER HARVESTING,WESTERN MONTANA NEEDS ALL OF THE JOBS IT CAN GET TO CONTINUE TO PROVIDE WORK FOR ITS PEOPLE. WITHOUT LUMBER AND RANCHING,THERE WOULD BE MANY SERVICE-RELATED PEOPLE OUT OF WORK. IF PEOPLE CONTINUE TO PUSH FOR MORE ACRES OF WILDERNESS LANDS, IT IS GOING TO TAKE AWAY MORE BADLY NEEDED JOBS IN THE MISSOULA AREA.

I WOULD LIKE TO SEE A FEW CHANGES IN THE SNOWMOBILE-CROSS COUNTRY
29 SKI TRAILS AT GARNET. AS THIS AREA GETSSOME MONEY TO GROOM SNOWMOBILE TRAILS FROM THE STATE GAS TAX. I FEEL IT IS TIME THAT CROSS COUNTRY SKIERS PAY A USER FEE WHEN EVER THEY SKI AND ENJOYGROOMED TRAILS. IN SOME STATES WHERE SKIERS USE GROOMED TRAILS, THE SKIER PAYS A LICENSE FEE WHICH GOES INTO FUNDINGFOR GROOMING SKI TRAILS.

WE THE SNOWMOBILERS ARE FORTUNATE TO BE ABLE TO SNOWMOBILE ON PUBLIC LANDS. I HOPE YOU WILL ALWAYS CONSIDER THE RECREATIONAL SNOWMOBILER AS YOU MAKE FUTURE FOREST PLANS.

SINCERLY

MARVIN HAMMER
4705 MILLER CREEK ROAD
MISSOULA,MONTANA 59803

37a

February 13, 1985

Statement for the Hearing on the Garnet Resource Area Resource Management Plan/EIS

Much has been accomplished in preserving Garnet since the seventies when the Bureau of Land Management began to protect and restore the buildings.

It is a unique site, and even though many of the buildings are no longer there, enough remains so people can understand how the people lived and with the aid of available pictures they can visualize what the town was like.

Montana's ghost towns have rapidly disappeared; so few remain. Garnet has a special setting in the Garnet Range.

Thousands do visit Garnet every year, so it is important that it be protected by a year-round guard and the existing buildings be stabilized and more restored.

Helen M. Hammond

Garnet Preservation Association
Montana Ghost Town Preservation Assn.
Western Montana Ghost Town Preservation Assn.
Author of Garnet, Montana's Last Gold Camp

Hearing Exhibit

38a

2-20-85

I feel that Alternative E is the best workable solution. I am opposed to any more wilderness areas.

John Hollenback

Typed for reproduction in the final EIS.

39a

Charles Kay
542 South 4th West
Missoula, MT 59801
Feb. 26, 1985

Mr. Dave Baker
Garnet Resource Area Office
3255 Fort Missoula Road
Missoula, MT 59801

Dear Mr. Baker:

This letter and its attachments are my comments on BLM's draft management plan/EIS for the Garnet Resource Area. My comments deal mainly with the eastern end of the Garnet Range - in the Hoodoo Mountain - Gallagher Creek - Mannix Park areas since I've had personal experience in that area for over 20 years. I also have BS and MS degrees in wildlife management, so my comments reflect both my personal experience and professional expertise.

85 As I discuss in my detailed comments which are attached, I am opposed to BLM's preferred alternative because, in my opinion, BLM has put too much emphasis and resources into timber harvest, road building, and livestock operations and not enough into wildlife and wildlife habitat.

BLM's handling of the Hoodoo Mountain and Gallagher Creek WSAs exemplifies their lack of concern for wildlife and especially elk.

Over the past 20 years, I watched all the private land surrounding these WSAs become roaded and logged. These WSAs are an island of vital escape cover that is completely surrounded by a sea of roads. The elk have been driven from the lower areas back into the mountains as the logging roads facilitated hunter access. The elk hunting now is little more than a run-and-gun-them situation which forces the remaining elk back into the WSAs. But if the WSAs are roaded and logged as proposed by BLM there will be virtually no escape cover for this elk herd. The Elk Logging Study of which BLM was a part, demonstrated that elk must have adequate escape cover.

86

63 Since the entire area surrounding them have been extensively roaded, I recommend that the Hoodoo Mountain and Gallagher Creek WSAs be designated as wilderness to provide adequate escape cover for this elk herd. Moreover, I suggest that the Hoodoo Mountain and Gallagher Creek WSAs be combined into one wilderness area to afford more protection to the elk and for ease of management. Presently a "jeep" trail is all that separates the two areas and this road (which I have often driven) can be closed off without degrading the wilderness qualities of the area as the "jeep" trail is little more than a wide horse trail.

38 Furthermore, I recommend that this wilderness area be expanded to the south (see attached map) to (1) protect all of Gallagher Creek, (2) protect more BLM land, (3) ensure more escape cover. This proposal

39b

38 would require BLM to trade other BLM lands for four sections of private lands - Sec. 7, 13, 17, and 19. This would form a core wilderness area of 22,200 acres of escape cover for elk and other big game animals.

24 BLM's draft plan calls for trading unattached BLM lands for a blocking up of lands for easier management. This proposal would block up BLM lands and therefore make management easier. By trading for the lands BLM would also acquire the rest of Mannix Park. BLM already controls about half of Mannix Park and this land trade would protect this area. Mannix Park is over one and one-half miles long and it is the largest grassland park in the area. Mannix Park has also been subjected to relatively light grazing pressure and is in good to excellent condition, and as such, it is unique; I know of no other comparable areas in Montana.

I've discussed this proposal with former BLM biologist Mr. Rob Hazlewood. Mr. Hazlewood supports this concept and he has indicated to me that prior to his transferring from BLM, he contacted the private landowners in question and they were agreeable in principle to trading these lands for other BLM lands. Twenty years ago, Mannix Park was heavily used by elk, but then an old sheep herders trail was widened out to provide access for 4x4s. Since that time, few elk use the park. With BLM ownership and wilderness protection this could again be excellent elk habitat.

I thank you for your time and for your consideration of my comments.

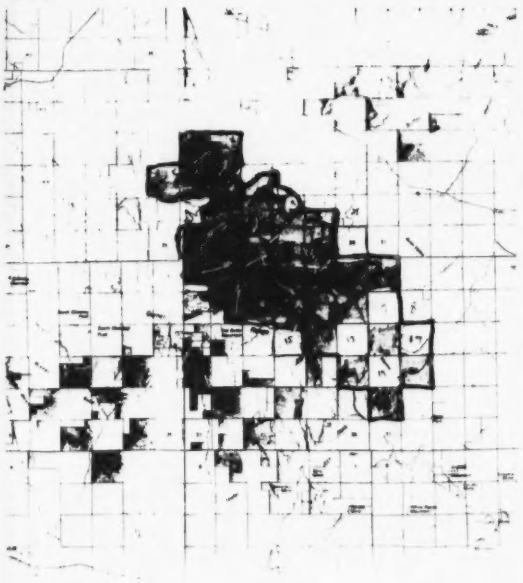
I am,

Sincerely yours,

Charles E. Kay

Typed for reproduction in the final EIS.

39c



39d

Detailed Comments on BLM's
draft Garnet Resource Area Management Plan and EIS

	page	
P	xiii	I support proper range management but BLM's proposed range improvements under their preferred alternative do not make economic sense. BLM states that cost of range improvements would be $585,600 for a project total of just over 8,000 AUMs. On page 102, BLM's 1984 rate per AUM was $1.37, 8,000 x $1.37 = $10,960 per year. $585,600 cost of improvements at even 10 percent interest = over $58,000 per year just in interest on the range improvements. BLM grazing fees do not even recover one-fifth the cost of the interest let alone the return of the capital investment. I am opposed to any range improvements that are not cost effective e.g., pay for themselves. If the range is overgrazed and needs measures to improve its condition - the permit holder should pay all those costs, after all it is the permit holder who overgrazed our public lands in the first place.
Q	9	Under "livestock grazing" the cost of range improvements and return on that investment should be a prime consideration. It presently is not listed.
53	92	Has BLM done any follow up studies to determine how well old logging areas are actually reforesting? I know of several clear-cuts in the area that have no to little tree regeneration. If the logged over lands are not actually growing trees then the maximum sustained yield allowable timber harvest must be reduced. BLM should include field data on actual reforestation rates or old logged areas.
72	102	"Livestock grazing" BLM's grazing fees should be increased to reflect the actual market value of that resource. The present system is little more than a hidden government subsidy or welfare for the cattle industry. In the present era of budget cutting all parties should pay their fair share.
100	123	On page 91 BLM states that since 1944 they have sold 228,329 mbf of timber at $4,772,988 or about $21 per mbf. BLM also states that they plan to harvest 6,500 mbf/year or $21 x 6,500 = $136,500 per year in timber receipts. On page 123 BLM states that the 30,000 hunter days on BLM lands were worth nearly $800,000 per year plus nearly $600,000 more in indirect benefits. From BLM's own figures, clearly wildlife and hunting generate more income from BLM lands than do timber harvest or cattle grazing. Thus BLM's primary objective should be to manage our lands for wildlife habitat not logging or livestock. Hence, BLM should revise this entire plan accordingly.

39e

	page	
96	167	Exactly how is BLM going to improve riparian habitat? Is BLM going to fence the cattle away from the streams? For I doubt if anything else would work.
73	173	Under management guideline item #1, as demonstrated by the above economic analysis - big game animals should be given priority on all ranges. On all winter ranges no livestock grazing whatsoever should be allowed.
39	175	I object to BLM's releasing WSA lands for roading and logging after they have completed this plan. WSAs should be managed in the present condition until Congress acts on their long-term status.
74	210-211, 215	Range Allotment 7216 is prime big game winter range where no grazing should be allowed. This allotment should be canceled and the area fenced to prohibit livestock. The number of AUMs should not be increased (pg. 215).
101	231	Public BLM AUMs should have no value to a private rancher. This is a public resource. If a private ranchers private land decreases in value because he is excluded from BLM lands, so what? - he has absolutely no personal claim to public lands that belong to all people. This is just another form of welfare for a privileged minority. I suggest that this consideration be deleted from the BLM plan.
27	265	BLMs figures on visitor use of the Hoodoo Mountain area should be revised upward from the stated level of 200/year, since there were more people than that in there last hunting season.
	269	Same comment as above - BLM says 100/year in Gallagher Creek - yet I met over 40 people in there on the opening day of big game season in 1984.
40	291-300	I find this section extremely deceptive. Listing all the WSAs gives the false impression that all those areas are going to be added to the wilderness system - which they are not. BLM should list the total WSAs, total agency recommendations for wilderness, total federal lands in Montana, and total lands (all) in Montana. Percent wilderness should be calculated by the entire state not just government lands.
41	299	Table P-5 is good but I suggest deleting the NPS wilderness
N		areas - because those lands are already in a National Park and not subject to resource development - they are not really part of the wilderness question. Should also include the FS recommendations as the Forest Plans come out.
102	303-308	Under BLM's analysis all size cattle operations are not economically viable. If this is true, why them or how do those people remain in the cattle business?

39f

	page	
87	309-314	Elk Logging Study Guidelines These guidelines are excellent, what I question is BLM's ability to follow these guidelines to protect the elk at the same time BLM plans to log our lands and build over 200 miles of new road (pg. 115). My professional opinion is that it is impossible to do both at the same time. Under BLM's draft plan, I believe that elk and other game animals would be severely impacted.
M	327	Errata under Chapter 3 pg. 88 BLM says to change the vehicle roadways on the map on page 88 to foot trails. This also applies to pgs. 30, 39, 237, 268. There are no roads in the Gallagher WSA.

Typed for reproduction in the final EIS.

40a

Russell W. Lawrence

[redacted]
Missoula, MT [redacted]

February 13, 1985

I'm here to express support for the BLM's Historic Preservation efforts in Garnet and to thank them for including it in their management plan.

Management plans, though, often are pie-in-the-sky documents, reflecting the best of all possible situations, given full funding. We all know that nobody gets full funding any more, and that programs get cut or cut back because of it. I'd like to suggest that the historic preservation efforts are substantially different than range or forestry or even recreation programs, and that they should receive priority in funding considerations.

32

When timber sales are delayed due to budget cuts, the trees, generally, will continue to grow. Rangeland, watershed and wildlife habitat can be managed conservatively in the absence of full funding; recreation can continue whether it is managed or not, but a historic building that is lost due to neglect or lack of protection can't be replaced. The Garnet historic area attracts a great deal of traffic, and deserves to be recognized as a major historic and recreational destination, but as such it requires the constant attention of a permanent caretaker, and that requires a funding commitment that can't be touched.

The cooperative agreement with the GPA is the other keystone that holds Garnet together, and they must be considered together. The present level of funding is insufficient without GPA support, but GPA's efforts are not enough, and won't be in the near future, without BLM's cooperation, support, and funding.

The GPA is working hard to hold up its end of the agreement, and speaking on behalf of the thousands of Garnet visitors every year, I strongly support the full funding of all the historic preservation activities identified in the plan, to ensure that everyone's efforts combine for the greatest good in Garnet.

Hessing
EXHIBIT
3

41a

Garnet Resource Area
Resource Management Plan

The Garnet Preservation Association supports management alternatives which will preserve, protect, and promote the ghost town.
We feel the town must be stabilized if it is to be publicly presented as a historical site. Our Association's involvement is to provide private funding to this stabilization/preservation goal. Our only real method of raising this funding is through involvement of the general public at the town site.
On this basis we must support Alternatives A or E which provide for access and continued maintenance of this historical resource.

Ivan L. Leigland
President
Garnet Preservation Association

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42a

March 11, 1985

Darrell Sall
Area Manager
Garnet Resource Area
3255 Fort Missoula Road
Missoula, MT 59802

Dear Mr. Sall:

I am very concerned about the future of Garnet ghost town, and I reviewed the Garnet Resource Area Management Plan (Draft) to determine what actions you propose for the townsite. I was glad to see that you recommended full implementation of the Garnet Ghost Town Management Plan, which includes the goal of maintaining a permanent full-time caretaker for the town.

32

As you know, Garnet is a non-renewable cultural resource, highly susceptible to damage from natural causes or vandalism. The highest priority for the protection of Garnet is the funding of the caretaker position. I hope that when the Garnet Resource Area Management Plan is implemented, funds will be permanently assigned to supporting this position.

I strongly support the BLM's historic preservation efforts, and I am glad that the Bureau has identified Garnet for protection and preservation. I urge you to commit the necessary funds to follow through completely on your management recommendations.

Sincerely,

Jean M. Matthews

Jean M. Matthews
1031 Cherry St.
Missoula, MT 59802

43a

February 13, 1985

Statement for the Hearing on the Garnet Resource Area Resource Management Plan/EIS

I lived in Garnet from 1917 to 1927 and my father, Sam Adams, came to Garnet in the late 1800's. He owned a general merchandise store. Part of our house is still standing. My mother had the Post Office in this house in the early 1900's. My father was also the owner of a number of mines. The blacksmith shop where Billy Liberty shoed so many horses still stands for people to see.

I am very happy to see what the BLM has done to restore so many buildings which otherwise would be gone.

People from all over, including Germany, visit Garnet every year and really enjoy seeing a ghost town, reliving for a few hours what it was like back in the early days.

I think it is wonderful that the BLM restored a couple of buildings that are being rented for sleeping quarters for snowmobilers and skiiers.

I hope the BLM will be able to continue as they are now.

Garnet is a very dear place to me.

Mary Jane Adams Mason

Garnet Preservation Association
Western Montana Ghost Town Preservation Assn.

Hessing
EXHIBIT
4

44a

Feb. 1, 1985

Dave Baker, Garnet Resource Manager

I'll introduce myself. I'm May Nelson, ranchers wife. Grew up at Bonita, have spent a good deal of time in the mountains in and around the Garnet area.

I'm writing in regard to the draft made for the Garnet Resource Area. I can live with Alternatives A or E.

I don't believe in wilderness areas, because it's public land. Only people like me, that can ride a horse or walk are entitled to see and enjoy these places. How many people do these or are able to do these? Any public land should be open to everyone or closed to everyone. With a trail wide enough cycles, snowmobiles, 4-wheelers, horses, backpackers, or skiers could enjoy it without any harm to the environment. What's a worn path in an area this big? Game make paths, they're not unsightly. On the contrary to what a few believe, none of these motorized things hurt or spook the game as much as a person on foot. I know. Game hear motorized vehicles and just move off these trails or roads and stand and watch you go by. Using a little common sense anyone that has spent much time in the mountains knows you can't just take off up mountains, over rocks and fallen trees to chase the game or tear up the earth.

I can go along with the no mining, logging, or powerlines, etc. for these areas. Most people that go to the mountains go because they love and respect it. I think of all the people that would love to see these places and can't because they are not able. The Bob Marshall is fine and I enjoy it, but it's enough for our area.

As for designating certain areas for cross-country skiers, snowmobilers, horsemen, or motorized vehicles I'm against for the same reason. We are adults or the majority of us are. We're not kids from the other side of town or Chicago east-side, west-side gangs. There is no reason why everyone can't use the same trails or roads and get along. If we can't, close them to everyone. I've been roaming these mountains for 30 years on horseback, cycles, foot, snowmobiles, and vehicles and never run into anyone disagreeable. And as long as people know this ground is for everyone they'll learn to live with it and get along as we have in the past or they'll go to a private area. But, let it be the people's choice.

Logging is a must, but I'm for selective cutting. I don't like the looks of clear-cuts unless the timber is infested. I agree with closing most of these logging roads. A hunter should be a sport and walk. There are enough roads open for hunters that can't walk. (I hate hunting.)

Cattle grazing is fine where there are allotments and not over grazed. As a ranchers wife I know you don't find many ranchers that do over graze, it's not to their benefit. We graze no public ground.

44b

And after having this outlined, I see where BLM might not be managing Western Montana but am sending this anyway. A note on the good side, I'd rather BLM manage this area than Forest Service.

Sincerely,

May Nelson
Drummond, Mont.

P.S. Forest Service signs that say, "Snowmobiles only, if there's snow", makes me sick.

Typed for reproduction in the final EIS.

45a

SLM 2-20-85
RE GARNET RESOURCE AREA

DEAR SIRS:

AS A LAND OWNER IN R13W, T13N, AND R12W T13N, AND ALSO AN OWNER OF A NUMBER OF UNPATENTED MINING CLAIMS IN THE SAME AREA, I AM DEFINATELY OPPOSED TO A WILDERNESS AREA AS DETAILED IN ALTERNATIVE ~~B~~. C. THIS WOULD INTERFERE WITH ANY FURTHER DEVELOPEMENT OF MINING ACTIVITIES THAT I AM INTERESTED IN PURSUING IN THE FUTURE. ACCESS TO THE PATENTED CLAIM COULD ALSO BE HAMPERED. IT WOULD ALSO BE A TERRIBLE WASTE OF THE OVERMATURE TIMBER STAND IN THE AREA.

A MULTIPLE USE PLAN SUCH AS ALTERNATIVE E WOULD BE MORE ACCEPTABLE THAN ANY OF THE OTHERS AS LONG AS IT IS HANDLED AS EXPLAINED

Stuart A Stapp
BOX 80
HELMVILLE, MT.
59843

46a

2-20-85 BLM Lands - Comments
Drummond - Garnet RMP

23 I. Small Tracts - Isolated

These should be sold. No way to fence them, police them, or tax them. They are often surrounded by one-owner private land and he uses them without paying taxes.

36 II. Wilderness

Areas designated (8) on the maps are too small for wilderness and much of it has been logged, grazed, or prospected and is not true wilderness.

71 III. Grazing

By all means continue but with good range management. How about a program of rotation where areas get a rest every few years?

14 IV. I notice that the small tracts near Pioneer are not classified for mining (14). The scene of the discovery of gold in Montana should be recognized:::

15 V. Oil and Gas

Lease all of it. Allow drilling anyplace. Some oil and gas would pep this country up!

VI. Timber and Big Game

Continue production. Mature forest is poor for game. Cut over areas produce more food for game.

Frank Trask, Jr. - Deer Lodge

Typed for reproduction in the final EIS.

47a

March 12, 1985

Sir:

I strongly support Alternative E of the Resource Management Plan for the Garnet Resource Area as presented by the Bureau of Land Management, Butte District.

Sincerely,

Fred Weaver

Typed for reproduction in the final EIS.

RESPONSES TO COMMENTS AND LETTERS

Water

Response A. Page 60 of the draft RMP/EIS provides an overview of water quality monitoring. Also, a Resource Monitoring and Evaluation Plan is entered into this final EIS as Appendix U. (Response to letter 1.)

Response B. Generally, water quality in the Garnet Resource Area (GRA) is good. A number of locations have problems involving sediment production, that are being addressed through use of management plans, site-specific activities, and implementation of regulations as appropriate.

The problem areas and proposed actions are listed in Table 3-2a and incorporated into Chapter 3 page 63 of the draft RMP/EIS, with text change noted in Chapter 8. (Response to letter 1.)

Response C. The draft Garnet RMP/EIS states on page 18 that "Best Management Practices (BMP), as developed through the Montana Statewide 208 Study, will be used to control nonpoint sources of water pollution resulting from forest management practices and similar activities." Appendix B includes a list of general BMPs which are considered most applicable to typical situations found in the area. The specific BMPs to be used for actual onsite mitigation or prevention of water quality impacts would be selected from the full range of BMPs available, including those contained in the October 1979, *Statewide Water Quality Management Plan*. See text changes in Chapter 8. (Response to letter 13.)

Response 1. The draft RMP/EIS incorporates by reference the Butte District Oil and Gas Environmental Assessment (USDI, BLM 1981) which addresses in part the impacts to groundwater and mitigating measures relating to oil and gas leasing. Mitigation of impacts to groundwater resulting from development of mineral resources generally requires implementation of the 3809 regulations and keeping spoil piles away from the 100-year floodplain. (Response to letter 7, 29.)

Response 2. The BLM uses Best Management Practices (techniques for controlling sediment production, for protecting vegetation, etc.) to meet its goal of maintaining water quality and stream channel stability in logged areas. Therefore, adverse impacts to the Yourname Creek watershed are not anticipated. Refer to Appendix A and Appendix B of the draft RMP/EIS for further information on this subject. Also see the monitoring plan in Appendix U. (Response to letter 16.)

Response 3. Management goals and guidelines for Management Area (MA) 1 emphasize stream stability. Little or no development will occur in these areas. (Response to letter 31.)

Response 4. There is no hydroelectric development on the public lands. Potential for small hydroelectric resources is low. In addition, such development would not have a significant effect upon allocation of resources and was not recognized as an issue during the scoping process.

Existing federal power reservations will be handled outside the RMP/EIS process by withdrawal review. The withdrawal review presently is taking place bureauwide. See page 20 of the draft RMP/EIS. (Response to letter 4.)

Response 5. Resource and program monitoring is an ongoing activity, although the Garnet RMP/EIS is the first land use plan for the GRA which formally incorporates comprehensive monitoring provisions (see Appendix U). Implementation of new monitoring actions and changes to existing monitoring will begin immediately following plan adoption, subject to funding and other constraints.

The Best Management Practices proposed for adoption in the Garnet RMP/EIS (see Appendix B) are derived from the 1978 State of Montana 208 Study.

Minor modifications have been made to make these BMPs more useful in light of local conditions and needs.

All BLM management activities, including monitoring, are coordinated with adjoining landowners and other agencies to the extent needed. For example, the BLM utilizes a basin analysis approach for GRA water quality management which includes assessment of cumulative impacts on lands of all ownerships. The GRA is currently working with the Forestry Division of the Montana Department of State Lands (Missoula office) to develop a process for insuring that all landowners or agencies in a basin cooperate in evaluating cumulative impacts for basin-wide management plans.

The final recommendations from the Montana Cooperative Elk Logging Study are proposed for adoption in the Garnet RMP/EIS (see Appendix S of the draft RMP/EIS). (Response to letter 13.)

Response 6. The BLM began developing a water quality data base for the GRA in 1978. This effort has been focused on acquiring information which could be used primarily to monitor the effects of timber harvest practices. Such information includes annual runoff and peak discharges, sediment production, and chemical constituents such as nitrates. Trace and heavy metal analysis is used on a case by case basis. Discharge and suspended sediment measurements are made often enough to provide data for use with existing runoff and sediment models. (See Appendix U for additional information.)

In the BLM/State of Montana Memorandum of Understanding (USDI, BLM 1980), the BLM has committed itself to maintain water quality and stream stability. In addition, the GRA has committed itself to maintain soil productivity. (Response to letter 13.)

Geology and Minerals Including Oil and Gas

Response D. The reference that barite is actively mined in the Coloma and Elk Creek areas will be incorporated on page 67 of the draft RMP/EIS. The text change is shown in Chapter 8. (Response to letter 10.)

Response E. The reference to Belt series is not applicable and will be changed to supergroup on page 67 of the draft RMP/EIS. The text change is shown in Chapter 8. (Response to letter 10.)

Response F. The time period for Precambrian Belt supergroup will be changed to 600 to 1600 million years on page 67 of the draft RMP/EIS. The text change is shown in Chapter 8. (Response to letter 10.)

Response G. The reference to sedimentary rocks will be modified and sandstone added on page 67 of the draft RMP/EIS. The text change is shown in Chapter 8. (Response to letter 10.)

Response H. The statement on glacial activity will be clarified on page 67 of the draft RMP/EIS. The resource management plan analyzed resources on public lands in Missoula, Granite, and Powell counties. The text change is shown in Chapter 8. (Response to letter 10.)

Response I. Either Madison Formation or Madison Limestone Formation is acceptable; Madison Formation is preferred and used in the final EIS. The text change is shown in Appendix T. (Response to letter 10.)

Response J. The definition of the terms appearing in Table 3-4 of the draft RMP/EIS are as follows. Low potential refers to an area where very few geologic characteristics favorable for the accumulation of a given resource are known to be present. Medium potential refers to an area where some geologic characteristics are present that are favorable for the accumulation of a given resource. High potential refers to an area where many geologic features are present that indicate the occurrence of a given resource. These definitions will be included as a footnote to the table on page 71 of the draft RMP/EIS and noted in the text changes in Chapter 8. See also Response 16. (Response to letters 7, 14.)

Response 7. Argillite and quartzite are considered to be sedimentary rocks which are weakly metamorphosed. (Response to letter 10.)

Response 8. The Fred Burr and upper Willow Creek moraines were singled out because they are the most striking examples on public land in the GRA. (Response to letter 10.)

Response 9. Again, the reference and emphasis is on public land in the GRA. The effects of glacial Lake Missoula can be seen in many other parts of western Montana, but the analysis centered on public lands administered by BLM. (Response to letter 10.)

Response 10. The Morrison-Maierle and Geo/Resource Consultants surveys are available for public review at the Garnet Resource Area Office, 3255 Fort Missoula Road, Missoula, Montana 59801. (Response to letter 10.)

Response 11. According to the *General Geologic Report, Blackfoot Planning Unit* (Morrison-Maierle 1978), "The natural levees are the only known features of their type present in Montana." (Response to letter 10.)

Response 12. Acres of surface is the total acreage where the BLM administers both the surface and subsurface estates. Acres of subsurface is the total acreage where the surface estate is privately owned with minerals reserved to the federal government. (Response to letter 10.)

Response 13. Phosphate and fluorite are misspelled on page 71 of the draft RMP/EIS and will be corrected in the final EIS (see Appendix T). (Response to letter 10.)

Response 14. MA 14 consists of active or recently active mineral extraction and processing operations on BLM-administered land. The Pioneer tracts have not been active for years and the Pioneer townsite is on private land. If nearby public land tracts are actively mined in the future, they will be designated as MA 14. The Gold Creek area is recognized on page 67 of the draft RMP/EIS as an important mining district. (Response to letter 46.)

Response 15. Under the preferred alternative, the lands closed to leasing and lands with stipulations prohibiting surface occupancy are minimized (520 and 8,180 acres respectively). The rationale for these protective measures is addressed in Chapter 2 and the impacts are addressed in Chapter 4 of the draft RMP/EIS. (Response to letters 46, 14)

Response 16. Table 3-4 reflects ratings compiled from several sources. This data was complemented with BLM's knowledge of the resources. There has been considerable interest in leasing, but little interest in exploring the lands addressed in the RMP/EIS. The larger tracts of public land are unlikely targets for exploration due to intrusive or extrusive igneous activity. These areas differ considerably from those presently being explored in western Montana. See also Response J. (Response to letter 14.)

Response 17. Acreage figures in Appendix O refer only to the Wilderness Study Areas (WSA). (Response to letter 14.)

Response 18. Management guideline 2 for MAs 5 and 6 states that oil and gas leases will be issued with standard stipulations and special stipulations as needed. If a seasonal stipulation is attached to a lease and then is found no longer applicable, a variance can be requested. (Response to letter 14.)

Response 19. Oil and gas exploration and mining activities can be conducted in a manner which minimizes environmental damage. Impacts were analyzed in Chapter 4 of the draft RMP/EIS and in the referenced Butte District Oil and Gas Environmental Assessment. While the current market situation for oil, gas, and minerals may persist for several more years, national policy is to encourage exploration and development of domestic energy and mineral resources. (Response to letter 29.)

Response 20. As per letter dated August 27, 1984 from the BLM to the Montana Department of Health and Environmental Sciences, it is the policy of the Butte District, and therefore of the Garnet Resource Area, to require mining claimants filing a notice or plan of operations to provide to BLM documentation that Montana State Water Quality Permits have been secured. (Response to letter 13.)

Land Ownership

Response 21. The public lands outside the identified retention zones (see Land Adjustment map which accompanies the draft RMP/EIS) are widely scattered. Where these lands occur BLM ownership is not great enough to maintain or influence watershed values in the drainage. (Response to letter 1.)

Response 22. The Garnet RMP/EIS addresses only those public lands currently administered by the BLM in Missoula, Granite, and Powell counties. Those Plum Creek lands located within proposed retention areas would be logical candidates for acquisition by the BLM. However, each tract would be considered on an individual basis using the acquisition criteria displayed in the draft RMP/EIS. (Response to letter 20.)

Response 23. Although some of the tracts outside the retention zone may be sold, the preferred method of disposal will be exchange of isolated tracts for lands within a retention zone. Exchange allows disposal of isolated tracts while improving the land ownership pattern for both private parties and the public. (Response to letter 46.)

Response 24. The public lands in the Mannix Park area have been identified as a retention zone and the BLM is interested in acquiring private lands in retention zones throughout the GRA. However, the acquisition of private lands through exchange is a complex and time consuming process, requiring full commitment of all parties. For additional information, see Response 38. (Response to letter 39.)

Response 25. The retention zones are the better blocked areas of public land and tracts along river corridors. Lands outside retention zones are described simply as "other" lands which could be considered for either retention or disposal. Some of these lands may be retained in public ownership based on site-specific application of the BLM State Director's land ownership adjustment criteria. The preferred method for any disposal would be exchange. It is estimated that over the next 20 years only 25 percent (4,700 acres) of the lands outside retention zones will leave public ownership, 95 percent (4,470 acres) of this by exchange. No tracts will be exchanged or sold without proper environmental evaluation and documentation, including appropriate public involvement, and the required notification in the Federal Register and local newspapers.

Even prior to issuance of the State Director's Guidance and the development of the draft RMP/EIS, the GRA has had an active and successful exchange program which has resulted in public acquisition of lands which significantly expanded wildlife and recreation values in public ownership. Site-specific land ownership adjustment decisions will continue to be made after consideration of the particular tradeoffs involving all resource values and uses, including wildlife habitat values.

There is no specific direction or priority in the State Director's Guidance to transfer title of public lands found suitable for disposal to the Montana Department of Fish, Wildlife, and Parks. (Response to letters 13, 26.)

Access

Response K. Access to private lands will not be restricted without coordinating first with the private landowner. This statement will be inserted in Chapter 2, page 20 of the draft RMP/EIS. The text change is shown in Chapter 8. (Response to letter 20.)

Response 26. Presently the BLM does not have good access for development of public lands in the Yourname Creek drainage. Access across private land in the bottom appears to be a good, logical route for a road system; however there appear to be other possible routes that could avoid private lands. Possible routes will be proposed, analyzed, and presented to the public before deciding on an acceptable road system for access to the drainage. (Response to letter 16.)

Recreation

Response 27. The hunter use estimates on pages 265 and 269 of the draft RMP/EIS are a result of BLM observations and are thought to be accurate. If the figures are off by 50 percent, the use is still low and would not affect proposed land use allocations. In addition, the allocations emphasize management practices which would not adversely impact recreation use. This has been analyzed in Chapter 4 of the draft RMP/EIS. (Response to letters 26, 39.)

Response 28. It is the full intent of the preferred alternative to continue current levels of snowmobile trail management. (Response to letter 33.)

Response 29. A license fee system for charging cross-country skiers, similar to the snowmobile user fee system, would need to be implemented by the Montana State Legislature. The BLM is exploring alternative ways to obtain funds to groom cross-country ski trails. (Response to letter 36.)

Cultural

Response L. The suggested change concerning the Lewis and Clark Trail will be incorporated on page 76 of the draft RMP/EIS. The text change is shown in Chapter 8. (Response to letter 8.)

Response 30. Interpretation of cultural resources, when not accompanied by increased monitoring or onsite surveillance, may result in increased vandalism. In the case of the Garnet RMP/EIS, such impacts will be minimized through monitoring (see Appendix U) and site-specific evaluation of alternative methods for interpretation during activity planning. (Response to letter 12.)

Response 31. The cultural resource management procedures are presented in Appendix G of the draft RMP/EIS. The National Historic Preservation Act is referenced on page 207 of the draft RMP/EIS. Section 106 of the National Historic Preservation Act, as amended, and its implementing regulations (36 CFR 800) and the National Register of Historic Places criteria (36 CFR 60.6) have been and will continue to be followed. (Response to letter 12.)

Response 32. The Garnet Resource Management Plan is a resource allocation document and cannot address budget issues. Funding was approached as an analysis assumption on page 103 of the draft RMP/EIS. (Response to letters 22, 34, 35, 40, 42.)

Response 33. There are many significant historic sites in western Montana and the importance of the Grant-Kohrs Ranch is understood. However, the listing of sites on pages 59 and 80 of the draft RMP/EIS were those occurring on public lands. (Response to letter 8.)

Response 34. Detailed planning for the Lewis and Clark Trail along the Blackfoot River, including compatibility with the Historic Trail Comprehensive Plan, will be conducted as a part of an activity plan mentioned in the draft RMP/EIS. (Response to letter 8.)

Response 35. Cultural surveys are required for each timber stand to be harvested and for accompanying roads. Also, there is a clause in every timber sale contract designed to mitigate impacts to cultural sites the BLM may have overlooked. Should you be aware of significant sites on public land not inventoried by BLM, you are encouraged to contact the GRA BLM office. (Response to letter 35.)

Wilderness

Response M. The map in Chapter 3, page 88 of the draft RMP/EIS, is correct. WSA maps of Gallagher Creek on pages 30, 39, 237, and 268 incorrectly portray foot trails as vehicle ways. There are no roads in the Gallagher Creek 202 WSA. This error will be noted in the errata, Appendix T. (Response to letters 26, 39.)

Response N. Appendix P has been updated to reflect the data published in the Forest Service plans and the current status of BLM wilderness studies. Also see Response 40. (Response to letters 26, 39.)

Response 36. The effects of wilderness management on the timber, mineral, and other resource programs were analyzed in Chapter 4 and Appendix O of the draft RMP/EIS. The resource values were described in Chapter 3 and Appendix O. Public response appears to be split between those favoring and those opposing wilderness. (Response to letters 11, 25, 46.)

Response 37. The special management area allocations of the Garnet RMP/EIS are provisions which remain in effect until such time as amended or until a new RMP is approved. Regulatory requirements for new RMPs or amendments provide for various opportunities for public involvement, including right of protest to the BLM Director. The rationale for selecting special management area and wildlife habitat emphasis allocations is covered in the Summary, Chapter 2, and Appendix O of the draft RMP/EIS. (Response to letters 25, 27.)

Response 38. A BLM Solicitor's opinion maintains that lands acquired after passage of the Federal Land Policy and Management Act (FLPMA) in 1976 cannot be studied for wilderness. Should any of the mentioned lands be acquired they would be proposed for management emphasizing wildlife habitat, as on adjacent public lands. (Response to letter 39.)

Response 39. The Secretary of the Interior ruled on December 30, 1982, (published in 47 Federal Register 58372) that BLM lands of less than 5,000 acres, areas of split mineral estate, and areas being studied because they are contiguous to other agencies' existing wilderness or WSAs would not be studied under the provisions of Section 603 of FLPMA.

If a field office chose to continue study of such areas, they could do so under the provisions of Section 202 of FLPMA which provided for study of an area for a variety of protective designations under the authority of the planning regulations (43 CFR 1601.6-1). Such areas found suitable for wilderness designation will be recommended to Congress in the same fashion as WSAs studied under Section 603 of FLPMA. Such areas found nonsuitable for wilderness designation would not be recommended to Congress. The final decision would be made in the Record of Decision for the RMP/EIS. A protest of such a decision should be made to the Montana State Director within 30 days of the issuance of the proposed RMP and final EIS. See the cover letter for further information. This Secretary of Interior decision is being challenged in the case of *Sierra Club et al. versus Watt, et al.*, January 13, 1983 (Civil 5-83-035 RAR). A ruling has been made on this case, but no interpretation has yet been given to the field offices. The final ruling does not affect interim management of the Garnet WSAs. (Response to letters 26, 39.)

Response 40. Table P-2 is a listing of areas the Forest Service was considering for study in its forest plans and was not intended to suggest that they will be recommended suitable for wilderness. At the time the draft document was being prepared the Forest Service was reevaluating all its roadless lands for wilderness suitability as required by several court decisions which found the RARE II documents for some states inadequate. This table simply states the situation at the particular moment it was written and before the forest plans were released with their findings. Table P-6, page 300, of the draft RMP/EIS is the actual listing of statutory wilderness areas in Montana. If Congress designates all the areas that currently have preliminary recommendations as suitable for wilderness, there would be 9,645,700 wilderness acres in Montana. This would be 35 percent of the federally-owned land in Montana or 10

percent of the total land base of the state. These estimates do not include the Centennial Mountains, which are still under study. See also Response N. (Response to letters 26, 39.)

Response 41. Table P-5 reflects administrative recommendations on wilderness currently pending before Congress.

Wilderness management has different objectives and is more restrictive in some ways than normal Park Service management. These lands are part of the whole wilderness equation and therefore will be retained in the tables. (Response to letters 26, 39.)

Response 42. The 200 miles of road to be constructed will be spread over 137,000 acres in the GRA during the next 20 years and will not totally occur in the WSAs. It is estimated in the plan that only 3,000 to 4,000 acres in the WSAs will be developed during the life of the plan, and the development will not occur until Congress releases them for multiple use management. Likewise, the projected timber harvest was calculated for the entire public land base and not just for the WSAs. In the preferred alternative 6,600 acres of the Wales Creek and Hoodoo Mountain WSAs are allocated to special management (MA 9) and the remaining 16,360 acres are allocated to MAs 4, 5, and 6, all of which emphasize wildlife habitat. Roads generally will be closed following completion of planned management activities. (Response to letter 26.)

Response 43. The 520-acre Quigg West 202 WSA contains very valuable habitat for the flourishing bighorn sheep herd and is adjacent to the 60,000-acre Forest Service Quigg RARE II area. Over half the tract is commercial forest land, not talus slopes or scree. The upper Gallagher Creek 202 WSA contains 1,000 acres proposed for special management (MA 9) and lies adjacent to a 1,700-acre tract in the Cottonwood Meadow complex which is also proposed for special management. These acreages contain important wildlife habitat. These areas are addressed in Chapters 2, 3, 4, and Appendix O of the draft RMP/EIS. (Response to letter 26.)

Response 44. The draft RMP/EIS discusses all significant environmental consequences which are reasonably foreseeable, including impacts occurring up to 20 years after implementation of the plan. The effects of resource development on wildlands in particular are discussed in Chapter 4 and Appendix O of the draft RMP/EIS. Also, the relationship between short-term uses and long-term productivity is summarized on page 160 of the draft RMP/EIS. (Response to letters 27, 29.)

Response 45. The draft RMP/EIS recommended three of the four WSAs as nonsuitable for wilderness designation after considering manageability, resource conflicts, need, and wilderness quality. Trade-offs of values and concerns, of which old-growth timber is one, also were considered in the recommendation. The ecotypes in those areas are well represented in the National Wilderness Preservation System (NWPS). (Six Douglas-fir, nine western spruce and fir, and five alpine meadow and barren ecotypes are presently represented in the NWPS. Also, 76 Douglas-fir, 109 western spruce and fir, and 5 alpine meadows and barren ecotypes are potential additions to the NWPS.) (Response to letter 35.)

Response 46. Vehicle use on the roads associated with the Wales Creek WSA degrades solitude values in portions of the WSA. The existence of mineralization has been documented (USDI, GS 1984 and WGM Inc. 1983). These factors, along with others, lead to the nonwilderness recommendation. However, 4,900 acres in the Wales Creek drainage is allocated to MA 9 with wildlife habitat emphasis. The resource values are analyzed in Appendix O of the draft RMP/EIS. See also Text Changes to References in Chapter 8. (Response to letter 35.)

Response 47. Recreational benefits derived from road building were not a consideration in recommending Gallagher Creek 202 WSA as nonwilderness. Chapter 3 states that existing roads are used by the public, but not that new roads are needed to accommodate recreational use. Mannix Park cannot be studied for possible wilderness designation because the public lands are not contiguous due to the checkerboard ownership. The resource values are analyzed in Appendix O and summarized in Table O-7, page 256 of the draft RMP/EIS. (Response to letter 35.)

Response 48. FLPMA and the BLM's wilderness study policy (Federal Register, February 3, 1982) guided the preparation of the draft RMP/EIS. The draft RMP/EIS identified the values of the WSAs and the trade-offs inherent in a nonwilderness as well as a wilderness recommendation. It concluded that the wilderness values did not override other competing resource uses. Public comment, received from 1979 to 1981 regarding wilderness study area classifications, was nearly divided between those opposing wilderness study and those supporting such study. (Response to letter 35.)

Response 49. Wilderness supply and demand were addressed in Chapter 3, page 82 of the draft RMP/EIS. Demand is one of several factors evaluated in arriving at wilderness recommendations. (Response to letter 27.)

Response 50. Ecotype diversity was one of several factors used to evaluate the wilderness suitability of the WSAs. Manageability, wilderness quality, economic conflicts, and need were also considered. These criteria are listed on page 9 and analyzed in Appendix O of the draft RMP/EIS. (Response to letter 27.)

Response 51. The existence of considerable wilderness resources in the region was not considered in evaluating the wilderness quality of the four WSAs, but is of paramount importance in analyzing the need for additional wilderness resources in the region. The Garnet RMP/EIS is a planning document involving certain trade-offs. The existence of important wilderness resources in the region decreases the scarcity value of the four WSAs. This factor combined with manageability, resource conflict, and wilderness quality issues resulted in a weighing of the wilderness value of the three WSAs as less than other competing resource uses. (Response to letter 27.)

Timber Management

Response 52. BLM timber sale receipts in the Garnet Resource Area exceed costs and no congressionally appropriated money is used to build BLM timber sale roads. The sale purchaser builds all required roads as a cost of logging. Therefore, "deficit logging" incorrectly describes GRA timber sales. Every BLM timber sale throughout the years has been purchased. (Response to letter 11.)

Response 53. The BLM has conducted inventories of previously logged areas to determine the level of reforestation (stocking). There are approximately 5,000 acres that were understocked as of the last inventory. These areas are being treated under a backlog reforestation program. A reinventory of the 5,000 acres is scheduled for the summer of 1985.

The allowable cut was determined by using a forest inventory, conducted in 1972, and factoring in acreages with reforestation problems. A reasonable regeneration lag time of 15 years for natural restocking is allowed. Present procedure ensures that reforestation problem areas which are harvested are being planted under the terms of timber sale contracts to avoid prolonged reforestation periods. (Response to letters 26, 39.)

Response 54. The reduction in stand susceptibility to spruce budworm is an important consideration in each stand treatment proposed. However, a commitment to multiple use management often restrains the treatment of large areas or conversion to species not susceptible to the insect. The above considerations are best handled in timber management plans or sale plans developed to implement the RMP. (Response to letter 31.)

Response 55. There are two elements basic to the concept of management areas which make up the difference of 1.5 million board feet between Alternatives B and E. Approximately one-third of the difference is due to 7,000 acres of commercial forest land being set aside or removed from timber harvest in Alternative E. The remaining two-thirds comes from the calculated 20 percent reduction in harvest from acres in MAs 4, 5, and 6.

The land use allocations for MAs 4, 5, and 6 coupled with road closures and guidelines from the Elk Logging Study (see Appendix S of the draft RMP/EIS) provide a positive approach to managing the forests for timber production as well as wildlife habitat. (Response to letter 18.)

Response 56. The limitations of the past forest inventory are understood. However, it was the best and only information available for developing the forestry portion of the RMP/EIS. Therefore, the potential growth figure of 76.4 board feet per year was used as an analysis assumption (page 104 of the draft RMP/EIS). A reinventory will be done when budgeting permits. (Response to letter 18.)

Response 57. The latest extensive forest inventory was conducted in 1972 on the Missoula Sustained Yield Unit (the public lands in the resource area). The average inventory yield was determined to be 76.4 board feet per acre per year. The maturity ages used in calculating the allowable cut were 100 years for lodgepole pine and 120 for all other species. This information, along with management area restrictions and acres of available commercial forest land, was used to determine an annual allowable cut of 7,030 mbf for Alternative E. Old-growth timber will be provided in MAs 1, 4, 5, 7, 8, 9, and 11, as well as in stands reaching rotation age in other MAs. Post sale regeneration is presently being handled as a requirement of timber sale contracts. Old understocked units are being planted at a rate of approximately 100 to 200 acres per year. Slash removal is addressed in the management area guidelines. Road closures are an integral part of the RMP and are specifically addressed in each timber sale plan. (Response to letter 35.)

Response 58. Visual resources are considered in each timber sale plan. Snowfall in the Garnet Range is generally sufficient to cover stumps and most slash; however, skiing would depend upon the type of cutting units and the heights of the regeneration. These specific considerations are better addressed in a timber sale or recreation activity plan. (Response to 35.)

Response 59. The total amount of CFL has decreased by about 4,000 acres since 1976 as a result of State Lieu Selection. However, the amount of CFL available for harvest has risen as a result of previously set aside CFL acres in Wales Creek, Hoodoo Mountain, and Gallagher Creek WSAs being proposed for multiple use management, and through acquisition of available land in exchange for land previously set aside in the Bonner Mountain area. Under Alternative E, the available CFL base amounts to 105,020 acres as compared to 87,920 acres under Alternative A, Current Management. The calculated allowable cut for 105,020 acres, including management area restrictions, produced a nine percent increase from the present level of 6,370 mbf/year to the projected level of 7,030 mbf/year. (Response to letter 13.)

Response 60. The sustained yield level is the 8,560 mbf/year calculated for Alternative B. Therefore, the level of harvest for Alternative E is 18 percent below the possible sustained yield level. This is a result of removing nearly 7,000 acres in MAs 1, 8, 9, 11, and 14 from the CFL base and by reducing the harvest by 20 percent on 64,720 acres in MAs 2, 4, 5, 6, and 10. (Response to letter 13.)

Response 61. The 1,352 acres of commercial forest land to be harvested annually, referenced on page 41 of the draft RMP/EIS, does not lead to a 78-year rotation period. As stated on page 104 of the draft RMP/EIS, an analysis assumption was that 40 percent of the acres identified in each year for timber harvest will be reentries into stands that previously have had some type of silvicultural treatment. (Response to letter 13.)

Road Management

Response O. The consideration of leaving old roads open was implied in the criteria for road management. However, it will be added on page 9 of the draft RMP/EIS. The text change is shown in Chapter 8. (Response to letter 23.)

Response 62. Road closures are implemented for various reasons and each stands upon its own merits. They are continually monitored for effectiveness; and, as conditions and reasons change, the closure area or dates may be altered. The Garnet Range Road serves many publics and although it has been plowed the past three winters to accommodate mining and recreational traffic, an alternate winter trail route has been maintained for winter sports enthusiasts. (Response to letter 30.)

Response 63. The BLM wilderness inventory for the GRA, conducted in 1981, identified the road between Gallagher Creek and Hoodoo Mountain WSAs as a constructed and maintained road which is accessible by two-wheel drive vehicles. At present the road provides access to the upper portions of the Hoodoo Mountain and Gallagher Creek WSAs and is the only road crossing the top of the Hoodoo Mountain range. There is ample protection now for elk as the adjacent area is undeveloped and there are no immediate plans or needs to close the road. As development occurs in the surrounding area, the need for road closures, to provide elk security including closure of the subject road, will be evaluated. (Response to letter 39.)

Response 64. Standard operating procedures and the preferred alternative provide a major commitment to road closures and walk-in hunting areas. All existing walk-in hunting units would be continued and four additional cooperative closure areas would be pursued with adjacent landowners. New roads will generally be closed after completion of the management activities.

No specific proposals have been made for the King Mountain area. Because of limited ownership, the BLM could not unilaterally control access. To date, adjacent landowners have not indicated an interest in pursuing a cooperative road closure in the area. (Response to letter 31.)

Response 65. Roads are a management necessity in some areas. Through activity and project planning, existing and future road needs will be evaluated for type and time of access control as a factor in elk habitat management. The impacts of roads are analyzed in Chapter 4 of the draft RMP/EIS. The road between Hoodoo Mountain WSA and Wales Creek WSA is a county road and therefore not under BLM control. See also Response 63. (Response to letter 29.)

Response 66. The types of roads and harvest techniques will be addressed in specific timber sale plans. Also see Responses 52 and 65. (Response to letter 29.)

Response 67. The status of the roads mentioned is shown on the Motorized Recreation Restriction map located in the packet at the end of the draft RMP/EIS. The Cap Wallace Road up to the old ridge road is closed to all motorized vehicle use from September 1 through November 30 as part of a cooperative road closure program to provide hunting opportunities on private land, reduce erosion, and provide security habitat during the hunting season. The original Cap Wallace Road past Chamberlain Meadows is closed yearlong, except to snowmobiles from December 1 to April 30, to minimize erosion on the granitic soils.

The Chamberlain Creek Fire Road out to Scotty Brown bridge is closed yearlong, except for snowmobiles from December 1 to April 30, to provide security habitat for big game and to minimize erosion. This road has been made impassable by logging on the public, private, and state lands. The road across the burn is closed yearlong, except to snowmobiles from December 1 to April 30, to minimize erosion and provide security habitat for big game. The last half mile of the Wales Creek Road is closed yearlong to retard erosion. The remaining portions of that road and the Elevation Mountain Fire Road are closed to all motorized vehicles, except snowmobiles from January 1 to April 30. The Deep Creek Road and Douglas Creek Road are open. Throughout the life of the plan the road closure program will be reviewed and monitored for its effectiveness, and changes in status could occur based upon the application of the criteria. (Response to letter 23.)

Response 68. Approximately 38 percent of the public lands are included in cooperative road closure areas. The importance of these areas is described on pages 57 and 77 of the draft RMP/EIS. Road closures would be applied as necessary on the adjacent public lands affected by timber management under all alternatives. The responsibility to properly manage wildlife habitat is acknowledged. A thorough discussion of the impacts to wildlife habitat is included in Chapter 4 of the draft RMP/EIS and in Response 85. (Response to letter 27.)

Response 69. A commitment to road closures is a trademark of the GRA and is carried forth in Chapter 2, pages 21 and 25 of the draft RMP/EIS. (Response to letter 13.)

Grazing

Response P. The range improvements shown in Tables 2-13 and 4-14 for Alternative E of the draft RMP/EIS have been adjusted. Weed control on 300 acres costs $5,100, 53 miles of fence cost $212,000, 19 cattleguards cost $38,000, 32 springs cost $80,000, and 3 miles of pipeline cost $21,000. The total cost is $356,100.

In each case (except for weed control), the numbers of improvements were adjusted downward by eliminating improvements on custodial allotments. Also, improvement costs were reviewed and some have been reduced to accurately reflect more recent costs.

Range improvement expenditures are proposed over a 20-year period, and often much of the cost is carried by the livestock operator. The costs listed above include all costs incurred should the improvement be contracted out. The benefits derived from the projects are greater than merely the collection of grazing fees. Many of these improvements are designed to benefit other resources; such as wildlife habitat, watershed, recreation, and timber management; and not solely to increase the amount or quality of forage available for livestock grazing. These benefits were used to develop the table on page 228 of the draft RMP/EIS which reveals that the proposed improvements will result in a favorable benefit to cost ratio. Text changes are shown in Chapter 8. (Response to letters 13, 26, 39.)

Response Q. The planning criteria for livestock grazing on page 9 of the draft RMP/EIS will be expanded to incorporate the consideration of costs of the improvements and the benefit to cost ratio. The text change is shown in Chapter 8. (Response to letters 26, 39.)

Response 70. The reference to "a 128 percent plus increase in acres available for grazing" is not correct. The acreages available for grazing vary only slightly between alternatives. However, there is an increase (128 percent) in the acres under intensive management in Allotment Management Plans (AMPs) between Alternatives A and E. The AMPs are designed to benefit wildlife habitat, forest, and livestock management. (Response to letter 11.)

Response 71. A rest-rotation system is a grazing method utilized on the public lands and discussed in Appendix K of the draft RMP/EIS. (Response to letter 46.)

Response 72. Grazing fees on public land are being addressed in the 1985 *Grazing Fee Review and Evaluation, Draft Report,* prepared by the FS and BLM. Also, see Response P. (Response to letters 26, 29, 39.)

Response 73. Wildlife habitat is emphasized in MA 6, but livestock grazing does not need to be removed from all big game winter ranges if sufficient forage exists for both. Eliminating livestock grazing on all big game winter range would incur tremendous costs for fences, cattleguards, etc. because of the complex landownership patterns. This concern is addressed on page 56 and in Appendix N of the draft RMP/EIS. (Response to letters 26, 39.)

Response 74. Allotment 7216 is programmed to be fenced to control livestock use. Fencing, along with better compliance and a change in the livestock turnout and removal dates, should improve the range condition. This will enable a long-term increase in forage available for livestock and wildlife. (Response to letter 39.)

Response 75. Very little of the range on public lands in the GRA is in poor condition. At present only one percent is classified as in poor condition. In the preferred alternative, such rangelands will be improved to fair or good condition. (Response to letter 26.)

Response 76. The public lands in the GRA are not badly overgrazed. Information indicates much of the land is in good to excellent condition and conditions will improve in all alternatives through the use of intensive grazing management systems. Alternative C proposes to limit grazing on all public land to a level established for lands in poor and fair condition. The 637 animal unit months (AUMs) represent the projected long-term increase over the short-term stocking rate for Alternative C. (Response to letter 26.)

Response 77. A replacement fence between public lands and Champion Timberlands in the Fivemile area will be constructed. (Response to letter 16.)

Response 78. Gate locations cannot easily be subjected to a distance standard in western Montana. The distance between gates is more often determined by such factors as trail crossings, topography, land ownership, etc. The GRA has and will continue to install gates in fence lines on public lands at less than one-mile intervals. (Response to letter 22.)

Response 79. Livestock grazing is a traditional yet infrequent use of the cultural sites (MA 11) and as such is not overly disruptive to the cultural resources. The ownership pattern in many sites prevents fencing and the cost of fencing would be very high. Livestock use on cultural sites will be monitored as described in Appendix U. (Response to letter 35.)

Response 80. Improving riparian habitat while increasing AUMs is achievable through better cattle distribution, improvement of range condition in non-riparian areas, and implementation of allotment management plans. Also see Response 96. (Response to letter 6.)

Response 81. The increase in AUMs for the preferred alternative is calculated on the basis of improved forage condition created by intensive grazing management (allotment management plans), increased compliance, and so forth. Increased AUMs created by logging and transitory range are not figured into the total AUMs for the preferred alternative. In addition, Table 2-11 on page 41 of the draft RMP/EIS shows 33,770 acres which will not be leased for livestock grazing. Most of this acreage contains important elk summer and fall habitat. (Response to letter 13.)

Response 82. As indicated on page 24 of the draft RMP/EIS in the second paragraph under Livestock Use Adjustments, target AUM figures are not final stocking rates. When adjustments are made, they will be done on the basis of mutual agreement or by decision. The latter includes monitoring of resource conditions as a basis for the decision. A monitoring plan is included as Appendix U. Most of the areas covered by the mid-1960 ocular reconnaissance and most of the areas where grazing systems are proposed were inventoried during the period 1978 to 1982 using the Montana Grazing Guides (USDA, SCS 1977). Projected increases on existing AMPs are based on monitoring that has occurred since the grazing systems were implemented. The allotments for which the ocular reconnaissance was not updated have not been proposed for adjustments in the stocking rate. (Response to letter 13.)

Weed Control

Response 83. The preferred alternative proposed to continue action on weed control. Weed control work by the BLM is to be carried out on an average of 15 acres each year over the next 20 years, subject to completion of a worst case analysis (see Response 84). This primarily will be roadside and small spot applications of herbicides to stop the spread of noxious weeds. This level of control was determined from the amount of new road which will be constructed over the life of the plan. Additional acres of public land are being treated through cooperative ventures between BLM and other agencies and landowners. Also, BLM has been active in biological weed control efforts for a number of years. (Refer to the Livestock sections for each alternative in Chapter 2 of the draft RMP/EIS for a description of the weed control proposals.) (Response to letters 17, 22.)

Response 84. The proposed level of weed treatment reflects BLM's efforts to control the spread of weeds on public lands only. The weed control program cannot be implemented until a worst case analysis for an environmental impact statement is prepared by the Oregon BLM State Office. The BLM is coordinating with Missoula, Granite, and Powell County Weed Boards for treatment of infested public lands. In addition to chemical control, biological control of noxious weeds can proceed and is an important part of the weed control program. Also see Appendix J, page 217, of the draft RMP/EIS. (Response to letter 13.)

Wildlife Habitat Management

Response R. A stated goal of each management area is to maintain site productivity, water quality, and stream stability. In addition the Cooperative Fish Management Plan for Public Lands in Montana will be made a part of the management guidance common to all alternatives on page 25 of the draft RMP. An objective of the cooperative plan deals with instream flow reservation. Text changes are noted in Chapter 8. (Response to letter 11.)

Response S. The reference to limiting the size of tree selection units will be addressed in management area guideline 13 in MA 5 and guideline 13 in MA 6. The point on cutting unit size for shelterwood and commerical thinning is best explained as a timing problem. Generally the first entry in a shelterwood or commercial thinning greatly reduces current thermal and hiding cover (not as severe for single tree or group selection), and then is followed by a period of understory regeneration. A timing conflict results when subsequent harvest entries are made before the regeneration can serve as hiding cover. Delaying entry until the regeneration can serve as hiding cover usually results in unacceptable mechanical damage to the regenerating trees; and both timber and habitat management is set back. A solution is to hold the cutting units to 40 acres or less, create a favorable situation for regeneration and survival, and accept a loss of hiding cover for as short a period as possible following subsequent entries. Text changes are shown in Chapter 8. (Response to letter 18.)

Response 85. The importance of wildlife habitat was recognized, along with other resource values, in developing the draft RMP/EIS, (see the Summary, page xiii; Chapter 2; management area descriptions, pages 14-16; Appendix A; Appendix O; and Appendix S). The preferred alternative places strong emphasis on wildlife habitat management. Under the preferred alternative 70 percent of the public lands will have stated wildlife habitat goals as compared to the current 51 percent. Also, over 33,000 acres in the resource area will not be leased for livestock grazing mainly because these areas are important to wildlife. (Response to letters 26, 39.)

Response 86. The Elk Logging Study guidelines are incorporated into the management area descriptions and are included in the draft RMP/EIS as Appendix S. In the preferred alternative, the WSAs are allocated to MAs 4, 5, and 9. These allocations will provide adequate escape cover for elk. Generally roads will be closed following management activities. (Response to letters 26, 39.)

Response 87. The BLM has made a substantial investment in the development of the Elk Logging Study guidelines and has applied the guidelines when managing timber and elk. The effectiveness of the guidelines in managing elk and logging roads will be monitored throughout the life of the plan. The BLM has followed the guidelines in the Chamberlain Creek area and elsewhere with excellent results. In addition, the 200 miles of road will not all be constructed in important elk habitat. Where roads are constructed in important elk habitat, an aggressive road closure program will be pursued. The resulting impacts of the actions mentioned above have been analyzed in Chapter 4 of the draft RMP/EIS. (Response to letter 39.)

Response 88. The importance of the public lands is acknowledged and addressed in the RMP/EIS. (Response to letter 26.)

Response 89. Your point of standard security cover is well taken. This criterion will be applied from viewing points within the stand and serves as a guideline to analyze other factors of slope position, topography, and vegetative screening. The Deerlodge and Lolo National Forests, in connection with the Intermountain Station, will study viewing angle in assessing hiding cover quality beginning in the summer of 1985. (Response to letter 31.)

Response 90. Security areas and reserve blocks for the most part serve as undisturbed units thereby reducing the impacts of adjacent treated areas. Quality, purpose, topography, and location for reserve units are just as important as distances. A reserve unit must be an economical unit for future harvest and slash treatment. Reserve units are available for scheduled harvest when their purpose has been served. (Response to letter 18.)

Response 91. The GRA public lands were not identified as occupied, critical, or essential habitat in the USDI Fish and Wildlife Service Recovery Plan for Grizzly Bears. (Response to letter 29.)

Response 92. The importance of wildlife to Montanans' lifestyles and to the enjoyment of others was recognized and evaluated in the draft RMP/EIS. Many measures were recommended to enhance wildlife habitat and to diminish the impacts of other uses. However, there are reasons in addition to wildlife that lead people to reside or visit Montana. In addition, the lands are managed for the public of the entire nation. The analysis of all resource uses is mandated by the Federal Land Policy and Management Act of 1976. The preferred alternative proposes management and conservation of the resources as

opposed to the preservation of resources. (Response to letter 27.)

Response 93. The commenter added the word "serious" in estimating long-term environmental consequences on wildlife summer range. The impacts described on page 112 of the draft RMP/EIS represent an analysis of trade-offs to meet livestock, timber, and recreation needs. Through conscientious planning and implementation, serious habitat degradation will be avoided. In addition, the public lands are in continuous change. For example as lands are developed, a comparable acreage is becoming rehabilitated. In a single year approximately 1,350 acres will be entered for timber management (27,040 acres over the life of the RMP). Approximately 40 percent of the 1,350 acres will be lands which have previously been treated and are being reentered. Also, much of the remaining 60 percent may be managed with timber practices emphasizing wildlife habitat. (Response to letter 27.)

Response 94. In addition to the strong commitments made in management area guidelines toward wildlife habitat improvement and maintenance, there are substantial improvements in winter range and riparian habitat conditions as a result of intensive grazing management under the preferred alternative, page 57 of the draft RMP/EIS. Also, aquatic habitat condition will improve significantly through proper application of Best Management Practices (Appendix B of the draft RMP/EIS) and intensive grazing management. Direct habitat improvement projects funded by the wildlife program are not specifically discussed in the draft RMP/EIS; however, previous and future projects include fencing, fence removal, gate installations, browse plantings, habitat manipulation via controlled burns, nesting site construction, etc. Also, habitat maintenance and improvement is considered in the development of other resource activity plans and habitat management plans prepared by staff wildlife biologists. (Response to letter 13.)

Response 95. The allocation of Wales, Hoodoo, Gallagher, Murray, and Douglas areas to MAs 4, 5, 6, and 9 and implementation of the guidelines contained therein, are designed to maintain adequate security areas. Also see Response 85. (Response to letter 13.)

Riparian Habitat

Response 96. Riparian habitat will be improved primarily through the installation of grazing systems. This method will allow for periodic rest of pastures and subsequent riparian areas within each pasture. In addition, salting and possible alternate water sources should draw livestock away from riparian areas presently in poor condition. Fencing should be considered as a last resort because it is generally too costly. Cutting AUMs was analyzed and it was determined there were other means to improve the habitat condition. The impacts are analyzed in Chapter 4 and Appendix N of the draft RMP/EIS. (Response to letters 26, 39.)

Response 97. Table 2-16, continued on page 46 of the draft RMP/EIS, contains a comparison of riparian habitat acreages. Table headings, Allocation/Output and Alternative E (Preferred), show there are 3,094 acres of currently unsatisfactory riparian which will be improved to satisfactory condition through intensive grazing management as delineated in allotment management plans; 1,110 acres of currently unsatisfactory riparian will likely remain in unsatisfactory condition because those acres will not be under intensive grazing management. The unsatisfactory riparian is often on small parcels of public land within large blocks of private land. There are 637 acres of riparian habitat in allotments (AMP and non-AMP) that will remain in satisfactory condition. Thus, 4,841 acres of riparian habitat will be affected by livestock grazing in Alternative E. The amount and condition of the riparian habitat outside of livestock grazing allotments are not discussed in the draft RMP/EIS. For Alternative E, this amounts to about 1,259 acres already in satisfactory condition or generally improving toward satisfactory condition within the short term without rehabilitative work. (Response to letter 6.)

Response 98. The 1,110 acres of riparian habitat in unsatisfactory condition are included in about eight allotments which are not scheduled for AMP development under Alternative E. However, opportunities exist in some situations for direct improvement through site-specific projects. These opportunities will be pursued. To improve all riparian habitat to satisfactory condition would require fencing. This is uneconomical and adversely impacts other resources. Also see Appendix N in the draft RMP/EIS.

There are approximately 16 miles of fish producing streams (including eight miles within livestock allotments) where stream habitat is unsurveyed. Refer to Table 3-21, page 100 of the draft RMP/EIS. Although the application of current Best Management Practices and management area prescriptions will serve to improve most suboptimum stream reaches, there are some stream reaches that will still lack adequate pool to riffle ratios or bottom material to classify as optimum condition. (Response to letter 6.)

Economics

Response 99. The economic values of recreation and wildlife use of the BLM-administered lands in the GRA are significant, but the changes in land use allocations do not create major economic changes between alternatives. The difference between jobs under each alternative amounts to less that one job per activity and less than three total jobs for big game hunting, nonmotorized recreation, and motorized recreation. The present number of jobs under Alternative A is shown on Table 7-3.

Changes from these totals, as stated above, for each of the alternatives is less than one job per activity. In addition, BLM-administered lands represent a small portion of the total federal lands in Western Montana. Some of the demand for these types of recreation would shift to other federal lands, meaning that the change of jobs from Alternative A may be less than those projected by each alternative.

The 12,000 recreation visitor days per year at Garnet Ghost Town are not included since the actions described in each alternative will not specifically alter use of the ghost town. (Response to letter 11.)

Response 100. The analysis on pages 122 and 123 of the draft RMP/EIS reveals the real economic benefits derived from multiple use management of the public lands. The analysis reveals that timber management contributes over $2,000,000 annually to the economy in direct and indirect benefits. This is in addition to the $1,400,000 derived from hunting. The analysis reveals that benefits are being derived from more than one resource. Also see Response 103. (Response to letter 26, 39.)

Response 101. Leasing for livestock grazing is a use of the public lands authorized by Congress. The National Environmental Policy Act requires that the effects of agency actions be analyzed in an environmental impact statement. While the agency looks on the grazing permit as having no monetary value, in practice the permit does have value to the rancher holding the lease. Since this value does exist in the perceptions of a large group of the users of the public lands, it is recognized and addressed. The analysis is in no way intended to imply ownership of the public lands by grazing permittees. (Response to letters 26, 39.)

Response 102. The data presented in the ranch budgets are averages based upon budgets developed by the U.S. Department of Agriculture. In a depressed economy, many ranchers do not make money and use the equity in land and equipment to stay in business. In good years they will replenish their investment in land and equipment. This cycle can go on for many years if good years for selling products occur often enough. The less frequently good years occur, the more ranchers will have to quit ranching. Those ranchers with a below average debt load are in a much better position to maintain their rancing operation in times of a depressed economy. (Response to letter 39.)

Response 103. It is difficult to make direct comparisons between the wildlife and range programs. Under range, the numbers cited include only the grazing fees collected by the BLM and the costs incurred by BLM, while the $573,241 figure for wildlife are benefits to the economy as a whole. The value to the economy of the ranches using BLM grazing in the GRA needs to be included to make the programs comparable. Using the portion of production of livestock from BLM lands, the direct and indirect benefits to the economy amount to approximately $566,000. Also see Response 100. (Response to letter 26.)

Response 104. The Timber Production Capability Classification (TPCC) system functioned as an objective physical and biological inventory process which yielded the following:

> Identification and basis for allocation of a commercial forest land base (lands capable of 16.7 percent of normal stocking and an annual growth rate of at least 20 cubic feet per acre per year and located on slopes of 65 percent or less) and,
>
> Identification of environmental site limitations (insolation, competition, soils, etc.) which would require special management and/or reduce the annual allowable harvest.

Beyond delineating tracts of land capable of producing commercial forest products on a sustained basis, the TPCC system provides an insight into the economic feasibility of managing individual sites for timber production by identifying costly special management practices (site preparation and planting) which may be required.

TABLE 7-3

NUMBER OF JOBS UNDER ALTERNATIVE A OF THE GARNET RMP

ACTIVITY	DIRECT JOBS	TOTAL JOBS
Big Game Hunting	39	62
Motorized Recreational Vehicle Days	3	4
Nonmotorized Recreational Vehicle Days	5	8

Most timber sales will include TPCC commercial forest classification sites in the nonproblem, fragile, and problem reforestation categories. Therefore, formulating economically sound timber sales resides more in designing defensible timber sale packages than in determining whether individual problem reforestation or fragile sites can be economically managed separately from the adjacent nonproblem sites. Also see Response 52. (Response to letter 13.)

Response 105. The only two federal payments to Montana counties which would vary by alternatives would be those received under the Taylor Grazing Act and the Mineral Leasing Act. The figures shown in Table 7-4 are the totals by alternative and are not broken down by counties. (Response to letter 13.)

Miscellaneous

Response 106. Although the limitations of cooperative management are recognized, cooperative management has been successful and useful to all participants in the carefully selected areas where it has been implemented. (Response to letter 20.)

Response 107. Fire certainly is a valuable vegetative management tool. The RMP identifies areas where fire was not to be used. These are riparian, recreation sites, cultural sites, and mineral production areas (MAs 1, 2, 10, 11, and 14). The extent of these areas is shown in Table S-3 for each alternative. On the remaining public lands the use of fire will be addressed on a case by case basis. (Response to letter 31.)

Response 108. Similar to the question regarding the use of fire, areas were identified where the use of herbicides would not be considered. However, until a worst case analysis has been completed by the BLM Oregon State Office, the BLM is under legal restraint from using herbicides as a tool for site preparation and weed control. (Response to letter 31.)

TABLE 7-4
FEDERAL PAYMENTS TO COUNTIES BY ALTERNATIVE

FUNDING AUTHORIZATION	ALTERNATIVE A	B	C	D	E
*Taylor Grazing Act	$5,546	$8,566	$3,343	$3,343	$5,807
Mineral Leasing Act	330,608	330,608	286,003	307,531	329,771
Payment in Lieu of Taxes	344,114	344,114	344,114	344,114	344,144
Total	$680,268	$683,288	$633,460	$654,988	$679,692

*Receipts calculated on the 1982 base rate of $1.86 per AUM.

CHAPTER 8
TEXT CHANGES

This chapter lists the changes to the text of the draft RMP/EIS. The text was changed in response to comments from the public and from agency review. The changes that respond to public comments are identified by the alphabetical letters that identify the comments. The changes that respond to agency review are not given an identification letter.

The specific changes in wording are highlighted in bold print.

TEXT CHANGES TO THE SUMMARY

The Summary of this document shows changes in bold print that respond to Comment P.

TEXT CHANGES TO CHAPTER 1

The third decision listed in the Land Ownership and Administration section on page 8 should read, "Where and what type of access is needed to **meet resource management objectives and usage of the public lands?"**

In response to Comment Q, the last sentence of the planning criteria for Livestock Grazing on page 9 should read, "The plan should consider:

suitability for grazing considering distance from water, sparsity and type of vegetation, steepness of slope, and manageability (cost and control);

the impacts of livestock grazing and Allotment Management Plans (AMPs) on wildlife habitat, riparian areas, watershed, and forest regeneration;

the impacts of meeting wildlife habitat, watershed, recreation, and forest product needs on grazing management;

the costs of the improvements; and

the benefit to cost ratio."

In response to Comment O, the planning criteria for Road Management on page 9 should read, "The plan should consider:

the availability and demand by the public for road use, **including the use of existing roads and trails;**

the cost and manageability of closing roads;

the impacts of not closing roads on maintenance costs, wildlife habitat, watershed, recreationists, vegetation (grass and trees); and

compatibility with adjoining land uses."

The planning criteria for Land Ownership Adjustment on page 10 should read as follows: "The RMP should follow the guidance outlined in the *Land Pattern Review and Land Adjustment Supplement to the State Director Guidance* (USDI, BLM 1984). Exchange will generally be the preferred means of land adjustment. **Any lands to be exchanged or sold must meet the criteria for disposal listed in FLPMA, Section 206 and 203(a). Prior to offering land for sale within a retention zone, a plan amendment would be completed.** The plan should consider:

the surrounding ownership, adjacent land uses, the need for public access, and the public attitude; and

the costs that have already been expended towards management (easements, line running, forest management, etc.) weighed against future management costs."

CHANGES TO THE PROPOSED RESOURCE MANAGEMENT PLAN

For the convenience of the reader, the proposed RMP, which includes the Standard Operating Procedures and Alternative E of the draft RMP/EIS, is reproduced below. This material is found on pages 18-25 and 41-43 of the draft RMP/EIS. **The text changes are highlighted in bold print.**

MANAGEMENT GUIDANCE COMMON TO ALL ALTERNATIVES (STANDARD OPERATING PROCEDURES)

The following management guidance consists of Standard Operating Procedures applicable to the entire resource area. This guidance constitutes a part of the total management direction for all alternatives considered in detail. It is presented here to avoid repetition.

Soil, Water, and Air Program

Soil, water, and air resources will continue to be evaluated and monitored on a case by case basis as a part of project level planning. The level of such evaluation and monitoring will be based upon the significance of the proposed project and the sensitivity of soil, water, and air resources in the affected area. Stipulations will be attached **to proposed projects** as appropriate to ensure compatibility of projects with management area goals and guidelines for soil, water, and air resources. It is the policy of the Garnet Resource Area to maintain, enhance, or restore site productivity, water quality, and stream stability on all public lands.

Air Quality

The BLM is a party to the Montana Smoke Management Cooperative Agreement. Under this agreement, the BLM will continue to work with state and local airshed groups to minimize air quality impacts from prescribed burns and similar activities. This will be done primarily through coordination with other agencies and by burning only when there is adequate smoke ventilation within the affected airshed. The watering of roads may be required during periods of construction or heavy traffic to alleviate localized dust problems.

Watershed Management

Surface disturbing activities will continue to be designed so as to maintain soil productivity, minimize erosion, and maintain or improve water quality and stream channel stability. Typical watershed concerns in the resource area will continue to be addressed through application of the following guidelines.

The timber productivity capability classification system, which is based on soil survey data, habitat types, elevation, aspect, and topography, will be used to classify forest lands (see Appendix C of the draft RMP/EIS). The TPCC system considers soil compaction and erosion potential, soil climate, and soil chemical and physical properties as related to silvicultural practices.

Stream channel protection will be effected through the use of such measures as the USFS Region One *Vegetation Manipulation Guidelines,* (USDI, FS 1965b) which are designed to limit increases in stream runoff to levels compatible with the capability of the channel to handle potential changes in flow and/or increases in sediment.

Best Management Practices (BMPs), as developed through the Montana Statewide 208 Study **(Montana 1979).** will be used to control nonpoint sources of water pollution resulting from forest management practices and similar activities. General Best Management Practices applicable to the Garnet Resource Area are identified in Appendix B of the draft RMP/EIS. In addition, more specific soil unit BMPs will be utilized on a case by case basis. These BMPs, which have not yet been formalized, reflect more localized soil physical, chemical, and climate conditions. Recommendations drawn from these BMPs may include silvicultural systems to be applied, treatment of slash residual, slash disposal methods, and skidding methods, all oriented toward maintaining soil productivity on specific soil units. **(Text change is in response to Comment C.)**

Projects covered by BMPs will be monitored to assess the degree to which BMPs are being applied and the effectiveness of their application. BMPs will be monitored through stream discharge and sediment measurements. An interdisciplinary, on the ground evaluation team (soils, hydrology, forestry, and wildlife) will be used to increase the effectiveness of BMPs monitoring. In accordance with an existing Memorandum of Understanding between the BLM and the State of Montana, an annual report will be made to the Montana Water Quality Bureau concerning BMPs application and effectiveness.

For timber sale planning, soils information, generally in the form of a soils map accompanied by a physical and chemical properties table, will be used to define soil capabilities and to recommend soil BMPs and mitigating measures. Hydrology information, where available, will be used to describe existing water quality and quantity; such information will also be used as a reference point for future monitoring of hydrologic conditions.

Corrective measures will be applied where unsatisfactory watershed conditions are identified. Such measures may be implemented through project-level plans (watershed, habitat, allotment, or compartment management plans); such measures may also be implemented through stipulations attached to permits, leases, and other authorizations.

Management activities in riparian zones generally will be designed to maintain or, where possible, improve riparian habitat condition. Roads and utility corridors will avoid riparian zones to the extent practicable. Prescribed fire will not be used within 75 feet of stream channels.

Energy and Minerals Program

Public lands generally will remain available for the exploration, development, and production of energy and mineral resources; such activities will be regulated to prevent unnecessary or undue degradation of surface resource values to the extent practicable. Such activities will also be guided by management area goals and guidelines (see Appendix A of the draft RMP/EIS).

Areas of federal subsurface ownership underlying private land also will generally remain available for energy and mineral exploration and development. Surface owners must be consulted by claimants/lessees. Proposed activities will be reviewed and authorized on a case by case basis.

Locatable Minerals

All public land is open to mineral entry and development except where withdrawn to protect other resource values and uses. Mining activities on public land will be regulated under 43 CFR 3809 to prevent unnecessary or undue degradation of surface resources and to ensure reasonable reclamation of disturbed sites. Standard procedures used in processing notices and plans of operations under the 3809 Regulations are summarized in Appendix D of the draft RMP/EIS.

Validity examinations may be provided under the following conditions:

- where a mineral patent application has been filed and a field examination is required to verify the validity of the claim(s);
- where there is a conflict with a disposal application, and it is deemed in the public interest to do so, or where the statute authorizing the disposal requires clearance of any encumbrance;
- where the land is needed for a federal program; or
- where a mining claim is located under the guise of the mining law and flagrant unauthorized use of the land or mineral resource is occurring.

Public land will be opened to mineral entry where mineral withdrawals are revoked.

Oil and Gas Leasing

All public land is available for oil and gas leasing, with the exception of land recommended for wilderness designation.

Site-specific decisions regarding lease issuance and the attachment of appropriate stipulations will continue to be based on application of the Butte District Oil and Gas Leasing checklist and the leasing guidelines contained in the Butte District Oil and Gas Leasing Environmental Assessment (issued September 1981). Standard and special stipulations and the Butte District Oil and Gas Leasing checklist are included in Appendix E of the draft RMP/EIS.

All oil and gas leases will be issued with standard stipulations attached. Special stipulations will be attached where needed to protect seasonal wildlife habitat and/or other sensitive resource values. In highly sensitive areas, where special stipulations are not sufficient to protect important surface values, stipulations prohibiting surface occupancy will be attached.

Oil and gas leasing guidance identified in this plan will apply only to leases processed after RMP approval. Existing leases will run their full term with only those stipulations attached at the time of lease issuance. Leases included in an operating unit or any future unit where production is established will remain unaffected by new stipulations as long as production continues or until leases are terminated.

Phosphate, Geothermal, and Other Leasables

Lease applications will continue to be processed as received. Site-specific decisions regarding lease issuance and the attachment of appropriate stipulations will be based on interdisciplinary review of each proposal.

Common Variety Mineral Materials

Applications for the removal of common variety mineral materials, including sand and gravel, will continue to be processed on a case by case basis. Stipulations to protect important surface values will be attached based on interdisciplinary review of each proposal.

Lands Program

Land Ownership Adjustments

The supplement to the State Director Guidance on *Land Pattern Review and Land Adjustment* (USDI, BLM 1984) provides criteria for use in categorizing public land for retention or adjustment, and for identifying acquisition priorities. Site-specific decisions regarding land ownership adjustment in the resource area will be made based largely on the following criteria derived from the supplement to State Director Guidance. This list is not considered all-inclusive, but represents the major factors affecting land adjustment in the Garnet Resource Area.

Areas of National Significance. Areas that have national environmental significance include wilderness, wilderness study areas, former wilderness study areas being studied for protective management, ACECs, and wetlands and riparian areas under Executive Order 11990. Areas that have national cultural and recreational significance include lands nominated or eligible for the National Register of Historic Places or designated as National Scenic and Historic Trails.

Areas Containing Important Features. Areas that have important wildlife features include threatened and endangered species habitat, prime fisheries habitat, big game seasonal habitat, waterfowl and upland game bird habitat, and habitat for sensitive species including raptors and other nongame species.

Areas that have important recreational and cultural features include hunting and fishing sites, snowmobile trails, and areas that contribute significantly to the interpretive potential of cultural resources already in public ownership. Areas that have important watershed features include strategic tracts along rivers, streams, lakes, ponds, and springs.

Areas Important to BLM Programs. These areas include tracts of public land that are consolidated enough to make management of their resources cost effective, and have physical and legal access. Access generally should allow for public use but, at the least, should allow administrative access to manage the resources. **Access to private lands will not be restricted without coordinating first with the private landowner.** Areas usually contain a combination of multiple use values and have characteristics that facilitate BLM priorities on the national, state, and local level. Areas may have improvements that represent public investments; be encumbered by R&PP leases, withdrawals, mining claims, etc.; or be managed by cooperative agreements with other agencies. **(Text change is in response to Comment K.)**

Areas Important to the Economy. These areas include tracts having mineral potential and lands that contribute significantly to the stability of the local economy by virtue of federal ownership.

The land ownership adjustment criteria identified above will be considered in land reports and environmental analyses prepared for specific adjustment proposals.

Public land within retention areas (see the Land Pattern Adjustment map in the map packet) generally will remain in public ownership and be managed by the BLM. Transfers to other public agencies will be considered where improved management efficiency would result. Minor adjustments involving exchanges or sales may be permitted based on site-specific application of the land ownership adjustment criteria.

Public land outside of retention areas may have potential for removal from BLM administration through exchanges or sales. Some of these lands may be retained in public ownership based on site-specific application of the land ownership adjustment criteria. In addition, BLM will respond to land adjustment proposals from the public. Exchanges will generally be preferred to sale. Public land identified for exchange or sale must meet the disposal criteria in *Land Pattern Review and Land Adjustment Supplement to State Director Guidance* (USDI, BLM 1984) and in Sections 203 and 206 of the Federal Land Policy and Management Act. No tracts will be exchanged or sold without proper environmental documentation and the required notification in the Federal Register and local newspapers.

Land to be acquired by BLM through exchange ordinarily must be located in retention areas. In addition, acquisition of such land should facilitate access to public land and resources, maintain or enhance important public values and uses, maintain or enhance local social and economic values, or facilitate implementation of other aspects of the Garnet RMP.

Consolidation of surface and subsurface ownership should be accomplished whenever possible to improve resource management opportunities and development potential.

Unauthorized Use

Unauthorized uses of public land will be resolved either through termination, authorization by lease or permit, or sale. Decisions will be based on the type and significance of improvements involved; conflicts with other resource values and uses, including potential values and uses; and whether the unauthorized use is intentional or unintentional.

Withdrawals

Current BLM policy is to minimize the acreage of public land withdrawn from mining and mineral leasing and, where applicable, to replace existing withdrawals with rights-of-way, leases, permits, or cooperative agreements.

At the present time, 1,800 acres are effectively withdrawn from mining, mineral leasing, and/or sale, location, and entry under the public land laws (see Table 2-2 on page 20 of the draft RMP/EIS).

All existing powersite and power project withdrawals will remain in effect unless modified or revoked as a result of the withdrawal review process. All withdrawals under the Classification and Multiple Use Act and the Recreation and Public Purposes Act will be recommended for revocation. However, for important historic and cultural sites (MA 11), such recommendations will be contingent upon withdrawal under Section 204 of FLPMA.

As provided in Section 4(d)(3) of the Wilderness Act and subject to valid existing rights, the minerals in lands designated as wilderness would be withdrawn from all forms of appropriation under the mining and mineral leasing laws.

Utility and Transportation Corridors

Public land within identified exclusion areas will not be available for utility and transportation corridor development. Public land within avoidance areas ordinarily will not be available for utility and transportation corridor development. Exceptions may be permitted based on type of and need for facility proposed; conflicts with other resource values and uses, including potential values and uses; and availability of alternatives and/or mitigating measures.

All other public land usually is available for development of utility and transportation corridors. Exceptions will be based on consideration of the criteria identified above.

Recreation Program

A broad range of outdoor recreation opportunities will continue to be provided for all segments of the public, commensurate with demand. Trails and other means of public access will continue to be maintained and developed where necessary to enhance recreation opportunities and allow public use. Recreation areas receiving the heaviest use will receive first priority for operation and maintenance funds. Sites that cannot be maintained to acceptable health and safety standards will be closed until deficiencies are corrected.

Investment of public funds for new recreation developments will be permitted only on land identified for retention in public ownership. However, no such developments are envisioned during the life of this plan. Therefore management will be limited to protecting the recreation potential of undeveloped sites.

Recreation activity plans have been or will be prepared for the following Special Recreation Management Areas (SRMAs): Garnet National Winter Recreation Trail, Lewis and Clark Trail and Blackfoot River, Garnet Ghost Town, Blackfoot Special Management Area, Clark Fork River, and **designated wilderness areas.**

These plans will provide more specific management guidance for recreation and other resources in each SRMA, consistent with the RMP. SRMAs are identified on the basis of high recreation use, the significance of recreation resources regionally and nationally, and the need to resolve conflicts in resource management or use.

Recreation resources will continue to be evaluated on a case by case basis as a part of project and activity planning. Such evaluations will consider the significance of the proposed action and the sensitivity of recreation resources in the affected area. Stipulations will be attached as appropriate to assure compatibility of the developments with recreation management objectives.

Recreation special use permits will be evaluated and approved on a case by case basis. This includes permits for commercial use, competitive events, and group activities such as trail rides, bicycle tours, and ORV events. No outfitter and guide permits will be issued for hunting except in conjunction with adjoining Forest Service permits.

Travel Planning and Motorized Vehicle Use

All public land will be designated as either open, limited, or closed to motorized vehicle use under authority of Executive Order 11644.

All existing road and area closures generally will remain in effect except for minor adjustments in the Chamberlain Creek drainage. New roads constructed in the future generally will be closed to motorized public use following completion of planned management activities. Cooperative closures involving adjoining landowners will be pursued in the Tenmile, Klondike, Warm Springs Creek, and Pearson Creek areas.

Public land within areas identified as limited to motorized vehicle use generally will receive priority attention during travel planning. Specific roads, trails, or portions of such areas may be restricted seasonally or yearlong to all or specified types of motorized vehicle use.

Public land within areas identified as closed to motorized vehicle use will be closed yearlong to all forms of motorized vehicle use. Exceptions may be allowed in wilderness study areas based on application of the Interim Management Policy.

Restrictions and closures will be established for specific roads, trails, or areas based on consideration of the following criteria:

the need to promote user enjoyment and minimize use conflicts;

the need to minimize damage to soil, watershed, vegetation, road beds, or other resource values;

the need to minimize harassment of wildlife or significant degradation of wildlife habitat;

the need to promote user safety; and

the need to cooperate with adjoining landowners.

Visual Resources

Visual resources will continue to be evaluated as a part of activity and project plans using the VRM guidelines described in Appendix F of the draft RMP/EIS. Such evaluation will consider the significance of the proposed project and the visual sensitivity of the affected area. Stipulations will be attached as appropriate to mitigate impacts on visual resources.

Areas recommended for or designated as wilderness (MA 8) will be subject to Class I VRM guidelines. Certain lands generally within riparian zones, recreation or cultural sites, special management areas, and visual corridors (MA 1, 2, 9, 10, 11, and 12) will be subject to Class II or III VRM guidelines. All other public land will be subject to Class III, IV, or V VRM guidelines, as previously mapped and referenced in the Garnet Management Situation Analysis. The precise location of VRM Classes II through V may be delineated in more detail during project or activity planning, based on the standard criteria for evaluating scenic quality, visual sensitivity, and distance zones.

Cultural Resources

Cultural resource management will continue to focus on Garnet Ghost Town. This will include conducting historical research, recording architectural features, and stabilizing deteriorating structures. Cooperative management with the Garnet Preservation Association will continue with the goal of fully implementing the Garnet Ghost Town Management Plan.

Emphasis will also be placed on the interpretation of key sites near Garnet, including Reynolds City, Beartown, Springtown, Summit Cabin, and Coloma; and at Blackfoot City.

On the remainder of the resource area, cultural resources will continue to be inventoried and evaluated as part of project level planning in compliance with Sections 106 and 110 of the National Historic Preservation Act of 1966, as amended. Such evaluation will consider the significance of the proposed project and the sensitivity of cultural resources in the affected area. Stipulations will be attached as appropriate to mitigate impacts on cultural resources.

Standard Operating Procedures for cultural resource management are summarized below and are described in more detail in Appendix G of the draft RMP/EIS:

Cultural resource inventories will be completed prior to any ground disturbing activity. Cultural resources will not be disturbed until evaluated by the District Manager or an authorized representative in consultation with the State Historic Preservation Officer to determine eligibility for inclusion on the National Register of Historic Places and/or the National Register of Historic Landmarks.

Consultation will also include appropriate representative(s) of Native American groups or organizations for cultural resources valuable for ceremonial, religious, or other sociocultural purposes.

Cultural resource sites generally will be protected from disturbance through project design and location. If sites are found to be eligible for the National Register(s) and cannot be avoided, a determination of the effect of the project on the site(s), including appropriate mitigating measures, will be made in consultation with the Montana Historic Preservation Officer and the National Advisory Council on Historic Preservation. No action affecting such sites will be permitted until the Advisory Council has had an opportunity to comment.

Adverse effects generally will be mitigated either through redesign of the proposed project so as to avoid the site or through complete excavation or other information recovery techniques. A memorandum of understanding will be developed with the Advisory Council to establish an acceptable level of mitigation for impacts on cultural resources when such impacts can not be avoided.

To provide for consideration of cultural resources not evident during inventories, a stipulation will be attached to each surface disturbing project requiring the operator to temporarily suspend work if buried cultural remains are encountered. The District Manager or an authorized representative will then determine the action necessary for protection or salvage of the discovery.

Wilderness Resources

The Interim Management Policy will continue to be applied to all wilderness study areas identified under Section 603 of FLPMA, and to any areas studied under Section 202 of FLPMA and recommended as suitable for wilderness designation, until such areas are reviewed and acted upon by Congress. Other 202 WSAs will be managed in accordance with applicable guidance provided by this RMP.

Public land within areas added by Congress to the National Wilderness Preservation System will be managed in compliance with the Wilderness Management Policy. Site-specific wilderness management plans will be developed for such areas.

Areas reviewed by Congress but not added to the National Wilderness Preservation System will be managed in accordance with other applicable guidance provided by this resource management plan.

Forestry Program

Although the annual harvest varies, each alternative will maintain a timber sale program. The development of the sale program will be the same for all alternatives. The CFL is divided into compartments which are geographic units of roughly 3,000 acres. The TPCC suitable CFL in each compartment is further divided into stands. Each stand is analyzed through the operations inventory for stocking, condition, age, and volume, and is given a priority for treatment. In addition to the stand analysis, a transportation system is developed for each compartment.

To develop a sale, a number of high priority stands are selected and a timber sale plan and environmental analysis is prepared and reviewed with an interdisciplinary team. These stands, after they are harvested or treated, are then monitored to determine how sucessful the treatment was in obtaining the silvicultural objectives of the prescription and meeting the goals and objectives of the specific management areas for these stands.

The timber management program is monitored on a stand basis. As stands are inventoried through the operations inventory a management program is prepared for the stand through rotation. Each step or activity in the management progression for the stand is monitored and evaluated to determine the timing for the next treatment. The stand development and the management objective must be reached before the next treatment phase is initiated.

Timber sale contracts are prepared for each sale. These contracts contain a wide range of standard clauses outlining the purchasers obligations for fire protection, watershed, soil protection, and road construction and maintenance. In addition to the standard clauses each contract will contain specific instructions on the location and manner in which the timber is to be harvested, location of required roads and construction specification for each road, and requirements for slash disposal, site preparation, timber stand improvement, regeneration, and performance bonds.

A typical monitoring sequence for a stand begins with a survival survey one-year after planting, and stocking surveys at three and five years to determine

if the new stand meets BLM stocking standards. Additional surveys occur at age 20 to establish need for precommercial thinning; at years 40, 60, and 80 to determine suitability for commercial thinning; and at age 100 to prepare a prescription for harvest.

Yearly extensive detection surveys are made over all the forest land to monitor insect and disease trends. Funds are available for insect and disease control projects where control can occur through some silvicultural action.

Range Program

Allotment Categorization

All grazing allotments have been assigned to one of three management categories based on present resource conditions and the potential for improvement (see Appendix H of the draft RMP/EIS). The M allotments generally will be managed to maintain current resource conditions; I allotments generally will be managed to improve resource conditions; and C allotments generally will receive custodial management to prevent resource deterioration.

Implementing Changes in Allotment Management

Allotment management plans generally will describe in detail the types of changes needed in an allotment and establish a schedule for implementation. Such plans will be based upon approved management objectives and guidelines established through the RMP process. Proposed changes in allotment management will be subject to the environmental review process, and such proposals will be modified or rejected when needed to mitigate adverse environmental impacts. Existing AMPs will be reviewed to assure consistency with RMP objectives and guidelines; wildlife and riparian habitat management objectives and forest regeneration considerations will be incorporated into existing AMPs as needed. The following sections contain discussions of changes likely to be recommended in an allotment management plan and the guidance that applies to these administrative actions.

Livestock Use Adjustments. Livestock use adjustments are most often made by changing one or more of the following: the kind or class of livestock grazing an allotment, the season of use, the stocking rate, or the pattern of grazing. For each of the five alternatives presented in this RMP, target stocking rates have been set for each allotment (refer to Appendix I of the draft RMP/EIS). While most livestock use adjustments will occur in the I allotments, use adjustments are permitted for allotments in categories C and M.

In reviewing the target stocking rate figures and other recommended changes, it is emphasized that the target AUM figures are not final stocking rates. Rather, all livestock use adjustments will be implemented through documented mutual agreement or by decision. When adjustments are made through mutual agreement, they may be implemented once the Rangeland Program Summary has been through a public review period. When livestock use adjustments are implemented by decision, the decision will be based on operator consultation, range survey data, and monitoring of resource conditions.

Current BLM policy emphasizes the use of a systematic monitoring program to verify the need for livestock adjustments proposed on the basis of one-time inventory data. Monitoring will also measure the changes brought about by new livestock management practices and evaluate the effectiveness of these management practices in meeting stated objectives.

The federal regulations that govern changes in allocation of livestock forage provide specific direction for livestock use adjustments implemented by decision (43 CFR 4110.3). These regulations provide guidance for the allocation of additional forage on a temporary and a permanent basis, as well as guidance for reducing the livestock grazing capacity due to a decrease in available forage. Permanent increases in the allocation of livestock forage or suspension of preference will generally be implemented over a five-year period but can be implemented in less than five years when agreement between the BLM and affected interests is reached to shorten the time span, or when a shorter period is necessary to protect public lands due to conditions created by such factors as fire, drought, or insect infestations, and a final decision is issued and placed in full force and effect under 4160.3(C) of this title.

Range Improvements and Treatments. Range improvements and treatments will be implemented under all alternatives. Typical range improvements and treatments and the general procedures to be followed in implementing them are described in Appendix J of the draft RMP/EIS. The extent, location, and timing of such actions will be based on the allotment specific management objectives adopted through the resource management planning process, and on interdisciplinary development and review of proposed actions and alternatives.

Weed control efforts on public lands will be designed to prevent the invasion of noxious weeds into areas presently free of weeds. Target weeds will include knapweed, leafy spurge, and musk thistle. Priority will be placed on control efforts along primary public access roads into public lands, control of spot infestations, and cooperation with adjoining landowners in the control of large weed infestations. **Biological control will be initiated on selected sites as control organisms are developed and proven as a viable method of weed control.**

Allotments in which range improvement funds are to be spent will be subjected to an economic analysis. The analysis will be used to develop a priority ranking of allotments for the commitment of range improvement funds that are needed to implement activity plans. The highest priority for implementation generally will go to those improvements for which the total anticipated benefits exceed costs. Other factors to be considered include resource needs,

public participation, operator contributions, and BLM funding capability. **Range improvements will occur in the I and M allotments. Appendix H of the draft RMP/EIS describes the criteria used to determine I, M, or C allotment categories and the general reasons warranting the expenditure of funds. (Text change is in response to Comment P.)**

Grazing Systems. Grazing systems will be used in all alternatives. The type of system selected for each AMP will be based on consideration of the following factors: allotment specific management objectives; resource characteristics, including vegetation potential and water availability; operator needs; and implementation costs.

Typical grazing systems available for consideration are described in Appendix K of the draft RMP/EIS.

Unleased Tracts. Unleased tracts will remain available for leasing, as provided for in the BLM grazing regulations (43 CFR 4110 and 4130), unless the RMP indicates no grazing will be allowed. Lands to be excluded from grazing may be made available for livestock use on a temporary, nonrenewable basis at the discretion of the Area Manager if such use would meet management goals and objectives for the area.

Wildlife and Fisheries Program

General

Wildlife and fish habitat will be evaluated on an individual basis as a part of project level planning. Each evaluation will consider the significance of the proposed action and the magnitude of impacts to wildlife habitat. Appropriate stipulations or restrictions will be used to mitigate these impacts.

Habitat improvement and maintenance projects will be implemented where needed to stabilize or improve habitat conditions. These projects will be identified through coordinated resource activity plans.

Threatened, Endangered, and Sensitive Species

No activities will be permitted in habitat for threatened and endangered species that would jeopardize continued species existence. Whenever possible, management activities in threatened, endangered, and sensitive species habitat will be designed to benefit those species through habitat improvement.

Fish and Wildlife Service and the Montana Department of Fish, Wildlife, and Parks will be consulted prior to actions that may affect threatened and endangered habitat. Whenever the BLM biological assessment process determines such habitat may be affected, consultation with the Fish and Wildlife Service will be initiated as per Section 7 of the Endangered Species Act, as amended.

Inventory and monitoring of occupied and potential threatened and endangered habitat will continue on the resource area.

Terrestrial Wildlife Habitat

Road and area closures will be pursued for wildlife security and other resource values. Wildlife habitat goals and objectives will be included in all resource activity plans and projects that could affect wildlife habitat.

The Montana Department of Fish, Wildlife, and Parks (MDFWP) will be consulted prior to vegetative manipulation projects in accordance with Supplement 1 of the Master Memorandum of Understanding, 1977. In addition, MDFWP will be consulted on timber harvest and timber stand improvement projects. All animal control programs will be coordinated with the U.S. Fish and Wildlife Service, MDFWP, and in the case of aerial gunning requests, with the Montana Department of Livestock.

Management actions within floodplains and wetlands will include measures to preserve, protect, and if necessary, restore their natural functions, as required by Executive Orders 11988 and 11990. Water crossings will be designed and installed to minimize sediment production and maintain adequate fish passage. Riparian habitat management needs will be considered when developing grazing systems, locating roads, and during layout of timber management activities.

Where applicable, the Montana Cooperative Elk Logging Study recommendations (USDA, FS 1982) including any future revisions will be followed (see Appendix S of the draft RMP/EIS). **Also, where applicable, the recommendations of the Cooperative Fish Management Plan for Public Lands in Montana (MDFWP; USDI, BLM 1984) will be followed. (Text change is in response to Comment R.)**

The resource area snag management policy will be followed.

Cadastral Survey Program

Cadastral surveys will continue to be conducted in support of resource management programs. Survey requirements and priorities will be determined on a yearly basis as a part of the annual work planning process.

Fire Program

The primary fire protection objectives will be to prevent, detect, suppress, and monitor all fires on BLM lands. These objectives may be accomplished through contract with the Montana Department of State Lands.

A fire management plan will be prepared to establish areas in which the appropriate suppression action of control or confinement will be implemented for all fire starts. The plan may also identify areas and conditions where the use of heavy equipment is restricted or prohibited. Approval of the fire management plan will be based on consideration of values at risk; fire

behavior; fire occurrence; beneficial fire effects, including but not limited to a reduction in fuel loading; fire suppression costs; and consistency with other agency plans and policies.

Road and Trail Construction and Maintenance Program

Road and trail construction and maintenance will continue to be conducted in support of resource management objectives. Construction and maintenance requirements and priorities will be determined on a yearly basis as a part of the annual work planning process.

Investment of public funds for road and trail construction generally will be permitted only on land identified for retention in public ownership. Exceptions may be allowed where investment costs can be recovered as a part of land disposal actions. Acquiring access or building roads to tracts outside the retention zones may be required for resource management activities such as timber sales.

Specific road and trail construction standards will be determined based on consideration of resource management needs; user safety; impacts to environmental values, including but not limited to wildlife and fisheries habitat, soil stability, recreation, and scenery; and construction and maintenance costs.

ALTERNATIVE E (PREFERRED)

Alternative E incorporates portions of the other four alternatives and generally represents a middle-ground approach to issue resolution. This alternative balances competing demands by making public lands available for a wide variety of resource uses while protecting and enhancing important and sensitive environmental values. Management area allocations are summarized in Table 2-10 on page 41 of the draft RMP/EIS and illustrated on the Alternative E Management Areas map in the map packet of the draft RMP/EIS.

The response to each issue and needed decision is based on the full range of resource potentials and conditions as well as legal and policy requirements and social and economic considerations.

Renewable Resources

Under Alternative E, 105,020 acres of CFL would be available for harvest. This represents 93 percent of the total CFL. A total of 1,352 acres of CFL would be harvested annually, yielding 7,030 mbf of timber per year. There would be 10.5 miles of road construction each year.

Most of the CFL acreage that would be set aside from harvest is located within the Wales Creek, upper Gallagher Creek, and Cottonwood Meadows areas where 6,620 acres of CFL would be unavailable for harvest because of special management considerations. A total of 2,080 acres of CFL would be set aside or allocated to restrictive timber management to protect or maintain riparian and watershed values elsewhere in the resource area. An additional 280 acres of CFL would be set aside within one area recommended for wilderness designation, and 400 acres would be set aside within mineral production areas. A total of 62,700 acres of CFL would be allocated to restrictive timber management primarily to protect or enhance important wildlife habitat values.

The level of **forest development work accomplished with appropriated funds** would remain low and would include 100 acres of tree planting and 40 acres of thinning annually. Prescribed fire would be prohibited on 5,020 acres primarily within developed and potential recreation sites and adjacent to stream channels. Pesticide application would be prohibited within riparian areas.

A total of 33,770 acres would not be leased for livestock grazing (see Table 2-11 on page 41 of the draft RMP/EIS). These include 27,200 acres currently closed, and additional acreage in the Elk Creek, Pearson Creek, and Quigg Peak areas. A total of 111,890 acres would remain available for livestock use. The total authorized livestock use would increase to 6,245 AUMs or 5 percent above current licensed use.

Target stocking levels for individual allotments are indicated in Appendix I of the draft RMP/EIS. No allotments would be adjusted downward. Target stocking levels for allotments to be adjusted upward would be based on current grazing capacity estimates, considering vegetative condition ratings and applicable SCS production estimates.

Nine of the ten existing AMP allotments would remain under intensive grazing management. One existing AMP allotment, Devil Mountain (7201), would be placed under custodial management since the allotment boundaries have been modified to exclude livestock use from much of the original AMP area, and resource conditions are satisfactory on the remaining grazed acreage.

In addition, 11 other allotments would be placed under intensive management (see Table 2-12). Thus, a total of 83,263 acres would be affected by intensive grazing management. All new AMPs would be based on allotment specific multiple use management objectives addressing identified resource opportunities and conflicts. Future management actions would be designed to meet these objectives. Management opportunities and objectives for I allotments and implementation priorities are identified in Appendix M of the draft RMP/EIS.

Management changes for proposed AMP allotments would include the implementation of grazing systems and an increase in resource monitoring. Range improvements and treatments that would be needed to fully implement existing and proposed AMP allotments include 53 miles of fence, 19 cattleguards,

TABLE 2-12

NEW AMP ALLOTMENTS PROPOSED UNDER ALTERNATIVE E

Allotment Number and Name		BLM* Acreage
7101	Bonita-Clinton-Potomac	12,143
7102	Weaver	4,410
7104	Lund #1	8,942
7105	McMahon	1,460
7106	Iverson	3,937
7108	Lund #2	3,518
7109	Semenza #1	5,908
7219	Mannix	2,000
7221	Murphy	1,103
7312	H. Luthje	2,866
7324	Collins #2	1,362
	Total Acreage	47,649

*Text change is in response to Comment P.

32 spring developments, 3 miles of pipeline, and 300 acres of weed control. **(Text change is in response to Comment P.)**

Special Attention Resources

The 520-acre Quigg West WSA would be recommended for wilderness designation contingent on the U.S. Forest Service wilderness recommendation for Quigg. Timber harvest, road construction, mineral entry, mineral leasing, and motorized vehicle use would be prohibited. A wilderness management plan would be prepared in accordance with BLM wilderness management policy. WSA boundaries and alternative wilderness recommendations are displayed on individual WSA Alternative maps.

Twenty acres in Rattler Gulch would be designated as an ACEC for its educational value and withdrawn from mineral entry as a means of protecting a unique limestone feature from possible mineral development.

A total of 3,500 acres would be managed primarily to maintain or enhance a variety of riparian habitat values. All other riparian habitat would be managed under Standard Operating Procedures designed to maintain site productivity, water quality, and streambank stability.

A total of 80,450 acres would be managed primarily to emphasize big game habitat including elk summer and fall habitat components, big game summer and fall range, and big game winter range while providing for timber harvest. These areas are in addition to the 8,660 acres allocated to wilderness and other special management where management emphasis would include the protection and enhancement of wildlife habitat values. An additional 5,800 acres of noncommercial forest and TPCC withdrawn commercial forest land would be managed with emphasis on maintaining old-growth and mature forest habitats and unique features for wildlife use.

Nonrenewable Resources

Under Alternative E, 205,066 acres of federal minerals in the resource area would be available for oil and gas leasing. Of this total, 84,076 acres would be leased with special stipulations, and 8,180 acres would not be available for surface occupancy. All land recommended for wilderness designation would be closed to oil and gas leasing pending congressional action. Areas affected by seasonal restriction and stipulations prohibiting surface occupancy consist largely of special management areas and existing and potential road closure areas where wildlife habitat values are important.

All existing powersite and power project withdrawals, totalling 1,300 acres, would remain in effect under this alternative. All other withdrawals would be recommended for revocation. Important cultural and historic sites, 160 acres, and 20 acres proposed for ACEC designation would be recommended for withdrawal under Section 204 of FLPMA. All land recommended for wilderness designation would be withdrawn under Section 4(c)(3) of the Wilderness Act.

Land Ownership and Administration

A number of retention zones would be identified, where public lands generally will be retained in public ownership (see Proposed Retention Zones map in map packet of the draft RMP/EIS). About 126,872 acres would be located within retention zones. All other public lands would be considered for either retention or disposal through transfer, exchange, or sale. The preferred method for disposal would be to exchange for lands within a retention zone.

A total of 127,500 acres would be available for further consideration and possible routing of major utility and transportation rights-of-way. About 17,620 acres associated with riparian areas, important recreation, historic and cultural sites, and other special management areas would be identified as avoidance areas where rights-of-way would be discouraged. All land recommended for wilderness and ACEC designation would be excluded from corridor development.

The level of public and administrative access to public lands would increase. New public access would be sought for an additional 9,500 acres, and administrative access would be sought for an additional 8,150 acres. A total of 8,090 acres would remain legally inaccessible for either public or administrative purposes.

All existing powersite and power project withdrawals, totalling 1,300 acres, will remain in effect. Such withdrawals generally are located at existing and potential powersites and power projects along the Clark Fork and Blackfoot rivers. All other withdrawals under the R&PP and the C&MU will be recommended for revocation. A total of 160 acres associated with important cultural and historic sites (MA 11) will be recommended for withdrawal under Section 204 of FLPMA.

Recreation, Cultural, and Aesthetic Resources

Under Alternative E, 131,919 acres would be available, on a restricted basis, for roaded and/or motorized recreation. The restrictions generally would take the form of seasonal closures and/or limiting use to specific roads and trails. A total of 5,040 acres in the Ram Mountain and Karshaw Mountain areas are roaded but would not be available for motorized recreation. The remaining 8,660 acres would be available for roadless, nonmotorized recreation; most of this acreage is located within areas recommended for wilderness designation or requiring other forms of special management.

A total of 41 developed and undeveloped recreation sites would be identified primarily for the protection of their recreation values. These are generally located near water and/or road closure gates. The 11 existing walk-in hunting areas would continue, and an effort would be made to establish four additional areas.

Garnet Ghost Town would continue to be managed cooperatively with the goal of fully implementing the Garnet Ghost Town Management Plan. The existing network of snowmobile trails would be maintained including the Garnet National Winter Recreation Trail. Cross-country ski trails would be developed in the vicinity of Garnet.

Efforts would be made to acquire additional public access to key tracts along the Blackfoot and Clark Fork rivers.

A total of 7,850 acres would be managed with primary emphasis on maintaining scenic quality (MA 12) including lands along the Clark Fork and Blackfoot rivers, Flint Creek, and Rock Creek.

TEXT CHANGES TO THE ALTERNATIVE RESOURCE MANAGEMENT PLANS

The first sentence of the third paragraph in the Renewable Resources section on pages 26, 32, 34, and 36 should read, "The level of **forest development work accomplished with appropriated funds** would remain low and would include 100 acres of tree planting and 40 acres of thinning annually."

The last sentence of the third paragraph in the Renewable Resources section on pages 26, 34, and 36 should read, "Pesticide use would be prohibited within riparian areas."

The last sentence of the second paragraph of the Recreation, Cultural, and Aesthetic Resources on pages 32, 35, and 40 should read, "The **11** existing walk-in hunting areas would continue, and 4 additional areas would be pursued."

Table 2-13 on page 44 of the draft RMP/EIS should read as Table S-1 of this document.

In Table 2-17 on page 48, the last part of the paragraph on Air Quality in all alternatives should read, "slash burning in the resource area will cause a **temporary** decrease in localized air quality." The second sentence in the Soil and Water section in Alternative C should read, "Road construction, which will **decrease** to 9.0 miles per year, will cause short-term increases in sediment production in streams."

In Table 2-17 on page 49, the second sentence in the Lands section for Alternatives B, C, D, and E should read, "Providing **public** access to an additional 9,500 acres **and administrative access to an additional 8,150 acres** of public land allows greater public use and improved management."

In Table 2-17 on page 50, the following should be added to the Visual section of Alternative B. **Visual quality will not be maintained along the Clark Fork River, Blackfoot River, Flint Creek, and Rock Creek.**

In Table 2-17 on page 54 in the first paragraph of the Wildlife and Fisheries section of all alternatives, the term "security cover" should be **security areas.**

In Table 2-17 on page 55, the fifth sentence in the Socioeconomic section of Alternatives C and D and the fourth sentence of Alternative E should read, "Land adjustments would have similar impacts as in Alternative B **for PILT payments."**

The second sentence of the third paragraph in the Renewable Resources section on page 56 should read, "Pesticide use would be prohibited within riparian areas."

The last sentence of the third paragraph in the Land Ownership and Administration section on page 58 should read, "Administrative access (not public access) to accomplish BLM objectives is proposed for **an additional** 8,150 acres."

The third sentence of the second paragraph of the Monitoring and Evaluation section on page 60 should read, "Monitoring efforts will focus on allotments in the I **and M categories."**

TEXT CHANGES TO CHAPTER 3

The reference to Table 3-2 in the Surface Water section on page 63 should become **Table 3-2a.** Table 3-2 on page 66 should become **Table 3-2a.**

The following changes should be made to footnote 5 on page 66.

	GRANODIORITE BASINS	HARD SEDIMENT BASINS (ARGILLITE, QUARTZITES, LIMESTONE)	TERTIARY VOLCANIC BASINS
High sediment producing areas	100 t/sq mi/yr	39 t/sq mi/yr	42 t/sq mi/yr
Normal sediment producing areas	25 t/sq mi/yr	10 t/sq mi/yr	11 t/sq mi/yr
Low sediment producing areas	10 t/sq mi/yr	4 t/sq mi/yr	4 t/sq mi/yr

In response to Comment B, the following should be added to the Surface Water section on page 63. **The problem areas and proposed actions are listed in Tabe 3-2b.**

TABLE 3-2b
STREAMS HAVING AREAS OF DECREASED WATER QUALITY

Site	Proposed Action
Black Bear Creek	Control livestock, improve road drainages, reseed exposed soil, relocate the road.
Braziel Creek	Develop activity plan to rehabilitate the site in 1987.
Keno Creek	Redesign and reconstruct road drainage (work in progress).
Marcum Mountain	Install check dams to control sediment production (work in progress).
McElwain Creek	Install check dams to control sediment production (work in progress).
Streamside riparian	Expand use of AMPs to reduce stream impacts.
Active mining areas	Resolve water quality problems through use of 3809 Regulations and coordination with the State Water Quality Bureau.

In response to Comments E, F, G, and H, the Geology section on page 67 should read as follows.

"The geology of the Garnet Resource Area is very diverse with all three categories of rocks present: igneous, metamorphic, and sedimentary. The rock types range in age from the late Precambrian Belt **supergroup** sediments (**600 to 1,600 million** years ago), to the very recent (ten thousand years ago and less).

"Igneous rocks such as basalt, andesite, and rhyolite are found in the eastern part of the Garnet Range and in upper Willow Creek. As a result of granitic intrusions, metamorphic rocks such as marble, hornfels, and garnetite can be found around the mining areas of Garnet, Coloma, Ashby, and Wallace creeks; Blackfoot City; Philipsburg; Gold Creek; upper Willow Creek; Sluice Gulch; Top O'Deep; and Henderson Gulch. Sedimentary rocks such as limestone, argillite, dolomite, quartzite, shale, **and sandstone** can be found generally throughout the resource area.

"Most of the **public lands in the** resouce area were not directly affected by glacial activity. However, glacial till can be found in moraines in Fred Burr and upper Willow creeks. Clay sediments were deposited in the upper Willow Creek area by a glacial lake. In the Drummond area, traces of ancient shorelines of glacial Lake Missoula are visible. Detailed information on the geologic structure of the Garnet Resource Area is contained in two surveys, Morrison-Maierle 1978 and Geo/Resource Consultants, Inc. 1983."

The third sentence in the second paragraph of the Oil and Gas section on page 67 should read, "Exploratory drilling has recently started within the northwest boundary of the GRA **as well as locations on private land near Drummond and Deer Lodge."**

In response to Comment D, the second sentence of the first paragraph of the Other Geologic Resources section on page 67 should read, "Barite occurs in vein deposits **and is actively mined** in the Coloma/Washoe Creek area and in the North Fork of Elk Creek."

In response to Comment J, the footnote to Table 3-4 on page 71 should read, "Rating is established from industry data gathered on GEM forms and from BLM inventory data.

"Low Potential: Very few geologic characteristics favorable for the accumulation of a given resource are known to be present.

Medium Potential: Some geologic characteristics are present that are favorable for the accumulation of a given resource.

High Potential: Many geologic features are present that indicate the occurrence of a given resource."

The third sentence of the third paragraph of the Recreation Resources section on page 74 should read, "**Except for wilderness study areas,** they also require recreation activity plans to provide specific management guidance for recreation and other resources."

In response to Comment L, the following addition should be made to the first paragraph of the Lewis and Clark Trail, Blackfoot River section on page 76. **Congress has designated the Lewis and Clark Trail as a National Historic Trail.**

The first paragraph of the Walk-in Hunting Areas section on page 77 should read as follows.

"A cooperative management effort between the BLM, private landowners, and MDFWP to establish walk-in hunting areas began in 1974. **Ten** walk-in hunting areas similar to the Blackfoot Special Management Area were created totalling **86,140** acres. Access is controlled by gates on existing roads."

The West Fork Buttes walk-in hunting area should be eliminated from Table 3-9 on page 79. The total acreage then becomes **128,140** and the total BLM acreage becomes **54,770.**

A new paragraph should be inserted after the first paragraph of the Cultural Resources section on page 80. **A Class I cultural resource inventory, consisting of a literature search, has been completed for the public lands. The literature search helped identify known sites for further evaluation and define future inventory needs.**

In response to Comment N, the first sentence of the third paragraph of the Wilderness Opportunities section on page 80 should read,
"About **26** percent of the acreage still being studied in **Montana** is on BLM-administered land."

In response to Comment N, Table 3-12 on page 81 should read as follows.

TABLE 3-12

REGIONAL WILDERNESS OPPORTUNITIES

	Designated Wilderness Areas			Presidentially Endorsed Areas			Further Study Areas		
State	Agency	Number of Areas	Acres	Agency	Number of Areas	Acres	Agency	Number of Areas	Acres
Montana	FS	12	**3,333,594**	NPS	2	1,084,660	FS	**180**	**5,611,789**
	FWS	3	64,997	FWS	15	**161,480**	BLM	**35**	**438,801**
	BLM	1	6,000				NPS	**1**	**7,645**
Idaho	FS	5	2,944,435	FS	17	1,240,424	FS	11	571,931
	NPS	1	43,243				BLM	54	1,326,799
Wyoming	FS	6	2,193,750	FS	17	627,100	FS	7	414,870
				NPS	2	1,848,744	BLM	36	565,260

BLM — Bureau of Land Management
FS — Forest Service
FWS — Fish and Wildlife Service
NPS — National Park Service

TEXT CHANGES TO CHAPTER 4

The following should be added to the fourth paragraph of the Analysis Assumptions section on page 103. **Section 603 wilderness study areas will remain under Interim Wilderness Management for up to half the life of the RMP because of the review process. The President has until 1991 to make a recommendation for designation or nondesignation to Congress. There is no set schedule for Congress to act on the recommendation.**

In response to Comment P, the last paragraph of Analysis Assumptions and Table 4-2 on page 104 will read as follows.

Project costs include the initial cost of planned improvements and their maintenance costs over a 10-year period; replacement cost of one-half the existing springs, fences, and pipelines; initial application for weed control and 2 maintenance applications; and the maintenance of existing projects over a 20-year period. All proposed projects have a serviceable life longer than the 20-year planning period. Therefore, no replacement costs are included for proposed projects. Table 4-2 lists the values used in calculating the costs.

TABLE 4-2

COSTS OF BUILDING, MAINTAINING, AND REPLACING RANGE IMPROVEMENTS

Improvement Or Treatment	Initial Or Replacement Cost[1]	Annual Maintenance Cost
Fence	**$4,000/mile**	$175/mile
Pipeline	**$7,000/mile**	$ 32/mile
Spring	**$2,500/each**	$ 60/each
Cattleguard	**$2,000/each**	$ 24/each
Weed Control	**$ 17/acre**	[2]

[1] Cost includes material and labor. Replacement is needed every 20 years.

[2] **Maintenance on weed control acres will be done twice in the 20-year period.**

Table 4-3 on pages 106-113 should be changed as previously indicated for Table 2-17 on pages 48-55 as these two tables are identical.

The first sentence of the second paragraph of the Impacts on Recreation Resources section on page 115 should read, "**The 11 existing walk-in hunting areas** are managed under Standard Operating Procedures and would not be significantly impacted."

In response to Comment P, the second paragraph in the Impacts on Range Resources section on page 118 should read as follows.

"Range improvement costs on proposed projects for Alternative A will total approximately **$181,900** for material and labor. Table 4-4 summarizes the **proposed range** improvements. Maintenance on the existing range improvements are estimated to cost **$299,210** for the 20-year period and **$55,820** for expected maintenance of **proposed** improvements."

In response to Comment P, Table 4-4 should read as follows.

TABLE 4-4

PROPOSED RANGE IMPROVEMENTS AND COST DATA FOR ALTERNATIVE A

IMPROVEMENT/ TREATMENT	UNIT	QUANTITY	COST*
Weed Control	Acres	200	$ 3,400
Fences	Miles	22	**$88,000**
Cattleguard	Each	7	**$14,000**
Springs	Each	25	$62,500
Pipeline	Miles	2	**$14,000**

*Cost data over 20-year period includes materials and labor.

In response to Comment P, the last sentence of the first paragraph of the Conclusion section on page 119 should read, "Both structural and nonstructural range improvements, maintenance, **and replacement** are proposed at a long-term total cost of **$735,090** or an average annual cost of **$36,754.**"

In response to Comment P, the third paragraph of the Impacts on Range Resources section on page 128 should read as follows.

"Range improvement costs will total approximately **$689,000.** Table 4-6 summarizes the **proposed range** improvements. Maintenance on **the proposed and existing improvements** will add another **$531,480** over the long term."

In response to Comment P, Table 4-6 on page 129 should read as follows.

TABLE 4-6

PROPOSED RANGE IMPROVEMENTS AND COST DATA FOR ALTERNATIVE B

IMPROVEMENT/ TREATMENT	UNIT	QUANTITY	COST*
Weed Control	Acres	500	$ 8,500
Fences	Miles	104	**$416,000**
Cattleguard	Each	32	**$ 64,000**
Springs	Each	69	$172,500
Pipeline	Miles	4	**$ 28,000**

*Cost data over 20-year period includes materials and labor.

In response to Comment P, the last sentence of the Conclusion section on page 130 should read, "Range improvement construction, maintenance, **and replacement** costs over the long term are projected to be **$1,428,930** or an average annual cost of **$71,446.**"

The second paragraph in the Locatables section on page 136 should read as follows.

"Designation of the four wilderness study areas **as** wilderness areas would have a detrimental effect on opportunities for locatable minerals. After **formal designation,** wilderness areas are closed to location of new mining claims. This equals 27,737 acres in this resource area. Wales Creek WSA is the only one of four wilderness study areas that contains unpatented (40) mining claims. Development work, extraction, and patenting would be allowed to continue on valid mining claims located on or before **wilderness designation.** Any mining activity in a wilderness area will require an approved plan of operations under the **3809** Regulations. The potential for metallic minerals ranges from low in Hoodoo WSA to medium in Quigg West 202 WSA, Gallagher 202 WSA, and part of Wales Creek WSA to high in the southern portion of Wales Creek WSA. Even though most of the 27,737 acres are moderate and low potential, designation as wilderness would mean the long-term loss of this potential. In the area of high rating, this potential, also, would be lost, subject to valid existing rights of the claimants."

In response to Comment P, the fifth paragraph of the Impacts on Range Resources section on page 139 should read as follows.

"Range **improvement** costs **on proposed projects** will total approximately **$332,000. Table 4-10** lists the improvements and their cost. Maintenance **and replacement** costs on existing projects and the new projects will add another **$623,120** over the long term. Table 4-10 summarizes **the proposed** range improvements."

In response to Comment P, Table 4-10 on page 139 should read as follows.

TABLE 4-10

PROPOSED RANGE IMPROVEMENTS AND COST DATA FOR ALTERNATIVES C AND D

IMPROVEMENT/ TREATMENT	UNIT	QUANTITY	COST*
Weed Control	Acres	0	$ 0
Fence	Miles	**73**	**$292,000**
Cattleguard	Each	**20**	**$ 40,000**
Spring	Each	0	$ 0
Pipeline	Miles	0	$ 0

*Cost data over 20-year period includes materials and labor.

In response to Comment P, the last sentence of the third paragraph in the Conclusion section on page 140 should read, "Range improvements would be limited to building control fences and cattleguards at a total estimated construction, maintenance, **and replacement** cost over the long term of **$955,120** or an average annual cost of **$47,756.**"

The fifth and sixth sentence of the second paragraph in the Locatable section on page 146 should read as follows.

"Development work, extraction, and patenting would be allowed to continue on valid claims located on or before **wilderness designation.** Any mining activity in a **wilderness study area** will require an approved plan of operations under the **3809** Regulations."

In response to Comment P, the third paragraph in the Impacts on Range Resources section on page 154 should read as follows.

"The range improvement costs will total approximately **$356,100.** Maintenance costs on new construction over the long term will run about **$117,470;** maintenance on existing projects will add another **$299,120;** weed control another **$10,200 and**

replacement another $191,450 for a grand total of **$974,340.** Table 4-14 summarizes the proposed range improvements."

In response to Comment P, Table 4-14 on page 154 should read as follows.

TABLE 4-14

PROPOSED RANGE IMPROVEMENTS AND COST DATA FOR ALTERNATIVE E

IMPROVEMENT/ TREATMENT	UNIT	QUANTITY	COST*
Weed Control	Acres	300	$ 5,100
Fence	Miles	53	$212,000
Cattleguard	Each	19	$ 38,000
Spring	Each	32	$ 80,000
Pipeline	Miles	3	$ 21,000

*Cost data over 20-year period includes materials and labor.

In response to Comment P, the last sentence of the first paragraph on page 156 should read, "Range improvement construction, maintenance, **and replacement** will cost **$974,340** over the long term or an average annual cost of **$48,717.**"

TEXT CHANGES TO APPENDIX A

In response to Comment S, the first sentence of Management Guideline 13 on page 172 should read, "In order to optimize cover effectiveness harvest **units, except single or group tree selection,** and thinning units will generally be irregular in shape at 20 to 40 acres."

In response to Comment S, the first sentence of Management Guideline 13 on page 174 should read, "Timber sale units, **except single or group tree selection,** and thermal or security cover areas will generally be 20 to 30 acres in size."

Management Guideline 4 on page 175 should read as follows.

"Subject to valid rights existing on **the date of wilderness designation,** mining will be prohibited and the area withdrawn from all forms of appropriation under the mining laws. Mining operations permitted because of valid existing rights must be based upon an approved plan of operations and will be regulated under 43 CFR **3809** and the BLM Wilderness Management Policy."

Management Guideline 2 on page 176 should read, "Oil and gas leases will be issued with **stipulations that prohibit surface occupancy,** as needed."

TEXT CHANGES TO APPENDIX B

In response to Comment C, the first sentence on page 181 should read, "The following Best Management Practices (BMPs) are adapted from the Montana Statewide 208 study **(Montana 1979).**"

TEXT CHANGES TO APPENDIX E

The following form was left out of the draft RMP/EIS. It should occupy page 202.

READEX

UNITED STATES DEPARTMENT OF THE INTERIOR
Bureau of Land Management

_____
(Serial No.)

LIMITED SURFACE USE STIPULATION

The lessee is given notice that all or portions of the lease area contain special values, are needed for special purposes, or require special attention to prevent damage to surface resources. Any surface use or occupancy within such areas will be strictly controlled. Use or occupancy will be authorized only when the lessee/operator demonstrates that the area is essential for operations and when the lessee/operator submits a surface use and operations plan, which is satisfactory to the Bureau of Land Management and the Surface Management Agency (SMA), for the protection of these special values and existing or planned uses. Appropriate modifications to the imposed restrictions will be made for the maintenance and operation of producing oil and gas wells. After the SMA has been advised of the proposed surface use or occupancy on those lands, and on request of the lessee/operator, the SMA will furnish further data on such areas, which now include but are not limited to:

Reason for Restriction:

(Continued on Reverse)

Duration of Restriction: (designate months)

Prior to acceptance of this stipulation, the prospective lessee is encouraged to contact the BLM/SMA for further information regarding the restrictive nature of this stipulation.

_____
Date

_____
Signature

TEXT CHANGES TO GLOSSARY

The following acronyms and definitions should be added to the Glossary.

FLPMA. Federal Land Policy and Management Act of 1976.

LEASABLE MINERALS. (1) All minerals except salable minerals on acquired lands. (2) All minerals on the Outer Continental Shelf. (3) Coal; phosphate; oil; gas; chlorides, sulphates, carbonates, borates, silicates or nitrates of potassium and sodium; sulphur in the states of Louisiana and New Mexico; native asphalt, solid and semisolid bitumen and bituminous rock including oil-impregnated rock or sands from which oil is recoverable only by special treatment after the deposit is mined. (4) Geothermal resources and associated byproducts. (Maley 1983)

SIZE CLASS. (See Appendix R.)

UNCLASSIFIED RANGE. A designation used for vegetative communities that could not be legitimately compared to a climax community. (See Appendix L.)

SECURITY AREAS. These are areas where elk may remain or move to following disturbing activities such as logging or hunting. Hiding cover (or security cover) alone will not constitute elk security.

SEASONAL RESTRICTION should be changed to read, "A restriction placed on **resource development and use.** The restriction is applied to protect **surface resources during a time when activities would adversely affect them.**"

The following should be added to the Security Cover definition. **In the final EIS the term security cover is synonymous with hiding cover.**

TEXT CHANGES TO REFERENCES

In response to Comments C, J, and R, the following references should be added to the references for the final EIS.

Montana Department of Health and Environmental Services, Water Quality Bureau. 1979. *Statewide Water Quality Management Plan: Recommendations of the Statewide 208 Water Quality Management Planning Project.* Helena, MT.

Montana Department of Fish, Wildlife and Parks. USDI, BLM. 1984. *Cooperative Fish Management Plan for Public Lands in Montana.* Helena, MT.

USDI, Geological Survey. 1984. *Phase II, Geochemical Mineral Resource Survey of the Wales Creek Wilderness Study Area (075-150), Powell County, Montana.* Reinhard W. Leinz and David J. Grimes. Open File Report 84-343. Denver, CO.

WGM Incorporated. 1983. *Phase I, Geology, Energy, and Mineral (GEM) Resource Assessment of the Garnet RA, Montana, including the Wales Creek (075-150), Hoodoo Mountain (075-151A) and Gallagher Creek (075-151B) Wilderness Study Areas.* Greg Fernette. Bureau of Land Management Contract Number YA-553-CT2-1039. Anchorage, AK.

APPENDIX A
MANAGEMENT AREA PRESCRIPTIONS

(See pages 167 to 180 of the draft Resource Management Plan and Environmental Impact Statement and Chapter 8 for text changes.)

APPENDIX B
BEST MANAGEMENT PRACTICES

(See pages 181 to 182 of the draft Resource Management Plan and Environmental Impact Statement, Chapter 8 for text changes, and Appendix T for Errata.)

APPENDIX C
TIMBER PRODUCTION CAPABILITY CLASSIFICATION

(See pages 183 to 185 of the draft Resource Management Plan and Environmental Impact Statement.)

APPENDIX D
PROCESSING NOTICES AND PLANS OF OPERATIONS UNDER THE 3809 REGULATIONS

(See pages 186 to 194 of the draft Resource Management Plan and Environmental Impact Statement and Appendix T for Errata.)

APPENDIX E
OIL AND GAS LEASING PROCEDURES

(See pages 196 to 201 of the draft Resource Management Plan and Environmental Impact Statement and Chapter 8 for text changes.)

APPENDIX F

GUIDELINES FOR IMPLEMENTATION OF VRM CLASSES

(See pages 203 to 205 of the draft Resource Management Plan and Environmental Impact Statement and Appendix T for Errata.)

APPENDIX G

CULTURAL RESOURCE MANAGEMENT PROCEDURES

(See pages 207 to 208 of the draft Resource Management Plan and Environmental Impact Statement and Appendix T for Errata.)

APPENDIX H

SUMMARY OF RESOURCE CONDITIONS USED TO CATEGORIZE GRAZING ALLOTMENTS

(See pages 209 to 213 of the draft Resource Management Plan and Environmental Impact Statement and Appendix T for Errata.)

APPENDIX I

ALTERNATIVE STOCKING RATES BY ALLOTMENT

(See pages 214 to 216 of the draft Resource Management Plan and Environmental Impact Statement and Appendix T for Errata.)

APPENDIX J
RANGE IMPROVEMENTS AND TREATMENTS

(See pages 217 to 218 of the draft Resource Management Plan and Environmental Impact Statement.)

APPENDIX K
GRAZING SYSTEMS

(See page 219 of the draft Resource Management Plan and Environmental Impact Statement.)

APPENDIX L
DATA ON INDIVIDUAL ALLOTMENTS: ECOLOGICAL CONDITION, FORAGE POTENTIAL, AND CURRENT MANAGEMENT PRACTICES

(See pages 220 to 225 of the draft Resource Management Plan and Environmental Impact Statement and Appendix T for Errata.)

APPENDIX M
MANAGEMENT OPPORTUNITIES AND OBJECTIVES FOR I ALLOTMENTS

(See pages 226 to 228 of the draft Resource Management Plan and Environmental Impact Statement and Appendix T for Errata.)

APPENDIX N

ANALYSIS OF THE NO GRAZING ALTERNATIVE

(See pages 229 to 232 of the draft Resource Management Plan and Environmental Impact Statement and Appendix T for Errata.)

APPENDIX O

DETAILED DISCUSSION OF AREAS BEING STUDIED FOR WILDERNESS

(See pages 233 to 289 of the draft Resource Management Plan and Environmental Impact Statement and Appendix T for Errata.)

APPENDIX P
STATEWIDE WILDERNESS STATUS SUMMARIES

Appendix P was updated in response to Comment N.

The following summaries list the current wilderness status for Montana. Table P-1 gives the status of wilderness study areas on public lands. Table P-2 lists areas still under wilderness study by other agencies. Table P-3 lists the wilderness recommendations that will be transmitted with the Garnet RMP/EIS. Table P-4 lists BLM wilderness study areas where the studies are complete and awaiting Presidential recommendations. Table P-5 lists wilderness recommendations pending before Congress for all agencies. Table P-6 lists the present Congressionally designated wilderness areas in Montana.

TABLE P-1
STATUS OF BLM AREAS UNDER WILDERNESS STUDY IN MONTANA

BLM District	County	Unit Name	Unit Number	Total Montana Acreage	Study Dates Start	Study Dates Complete
Butte	Beaverhead	Centennial Mtns.	—	30,189	1985	1987
TOTAL BLM		NUMBER OF AREAS 1		30,189 ACRES		

TABLE P-2
OTHER AGENCY AREAS IN MONTANA UNDER WILDERNESS STUDY OR WITH PRELIMINARY RECOMMENDATIONS

Agency	County(s)	Unit Name	Unit Number	Net Unit Acreage	Acres Recommended
FS	Ravalli	Tolan Creek	X1070	7,088	—
FS	Ravalli	Sleeping Child	X1074	21,423	—
FS	Ravalli	Swift Creek	1065	744	—
FS	Ravalli	Needle Creek	1066	1,085	—
FS	Ravalli, Granite	Selway-Bitterroot	1067	109,711	48,305
FS	Ravalli	Stony Mtn.	1808	103,266	—
FS	Ravalli	Blue Joint	1941	65,370	28,500
FS	Lake	Allan Mtn.	1946	102,286	—
FS	Flathead	Swan River Island	LIFAA	550	—
FS	Flathead	Benchmark	X1126	6,490	—
FS	Flathead	Coal Ridge	X1127	16,480	—
FS	Flathead	Deadhorse	X1128	23,550	—
FS	Flathead	Standard Peak	X1129	7,770	—
FS	Flathead, Lincoln	Mt. Hefty	1481	13,720	—
		Tuchuck	1482	19,820	—

Table P-2 Cont.

Agency	County(s)	Unit Name	Unit Number	Net Unit Acreage	Acres Recommended
FS	Flathead, Lincoln	Mt. Thompson Seton	TS483	71,750	—
FS	Lake, Missoula	Mission Additions	1500-1506	2,340	—
FS	Flathead	Lebeau Creek	L1507	6,210	—
FS	Flathead, Lake Missoula, Powell, Lewis & Clark, Teton, Pondera, Glacier	Bear-Marshall-Scapegoat-Swan	1485	865,178	164,945
FS	Lincoln	Zulu Creek	X166	6,400	—
FS	Lincoln	Marston Face	X172	6,000	—
FS	Lincoln	Mt. Willard-Lake Estelle	1173	256	—
FS	Lincoln	Gold Hill (West)	X176	10,200	—
FS	Lincoln	Flagstaff Mt.	X690	9,500	—
FS	Lincoln	Roberts Mt.	X691	2,700	—
FS	Sanders	West Fork Elk Cr.	X692	819	—
FS	Sanders	Rock Creek	X693	400	—
FS	Lincoln	Buckhorn Ridge	1661	27,000	—
FS	Lincoln	Scotchman Peaks	1662	64,280	36,380
FS	Lincoln	Northwest Peaks	1663	19,100	—
FS	Sanders	Trout Creek	1664	31,400	—
FS	Sanders	Cataract	1665	27,600	—
FS	Lincoln	Grizzly Peak	1667	6,000	—
FS	Lincoln	Gold Hill	1668	10,700	—
FS	Sanders, Lincoln	Cabinet Face West	1670	10,900	8,000
FS	Sanders, Lincoln	Cabinet Face East	1671	50,400	20,500
FS	Sanders	Berray Mtn.	1672	8,300	—
FS	Sanders	Government Mtn.	1673	8,600	—
FS	Sanders	Lone Cliff Smeads	1674	6,600	—
FS	Sanders	McNeeley	1675	7,700	—
FS	Sanders	McKay Creek	1676	13,500	6,700
FS	Sanders	Galena	1677	15,500	—
FS	Sanders	East Fork Elk Cr.	1678	5,000	—
FS	Sanders	Chippewa Creek	1682	2,300	400
FS	Lincoln	Ten Lakes & Contiguous Areas	1683-1683A	41,100	31,800
FS	Lincoln	Roderick	1684	24,800	—
FS	Granite	Emerine	X1423	16,161	—
FS	Granite	Sapphires	1421	116,530	—
FS	Granite	Silver King	1424	65,767	—
FS	Granite	North Carp	1425	12,042	—
FS	Granite	Upper East Fork	1426	7,361	—
FS	Deer Lodge	Storm Lake	1427	7,481	5,918
FS	Granite, Powell	Flint Range-Dolus Lake	1428-1429	60,297	—
FS	Silver Bow	Basin Creek	1430	9,888	—
FS	Silver Bow, Madison	Highlands	1431	20,921	—
FS	Jefferson, Silver Bow	O'Neil Creek	1432	6,511	—
FS	Jefferson	Whitetail-Haystack	1433-1434	71,249	—
FS	Granite	Fred Burr	1435	6,643	—
FS	Sanders	McGregor-Thompson	LILAQ	27,850	—
FS	Missoula	Petty Mtn.	X1202	16,980	—
FS	Missoula	Deep Creek	X1814	7,970	—
FS	Missoula	Rattlesnake	X1204	2,700	—
FS	Missoula	Reservation Divide	X1205	16,300	—
FS	Sanders	Baldy Mtn.	X1209	6,680	—
FS	Granite, Missoula	Ward Eagle	X1220	8,570	—
FS	Sanders	Teepee-Spring Cr.	X1786	14,890	—
FS	Sanders	Evans Gulch	X1811	8,830	—
FS	Sanders	Clear Creek	X1812	5,470	—
FS	Sanders	Maple Peak	1141	7,860	—
FS	Mineral	Stevens Peak	1142	600	—
FS	Mineral	Wonderful Peak	1152	1,600	—
FS	Mineral, Missoula	Hoodoo	1301	98,500	81,500

Agency	County(s)	Unit Name	Unit Number	Net Unit Acreage	Acres Recommended
FS	Mineral	Meadow Cr-Upper N. Fork	1302	7,200	—
FS	Missoula	Marshall Peak	1781	9,400	—
FS	Sanders	Cube-Iron-Silcox	1784	38,100	—
FS	Sanders	Sundance Ridge	1785	7,220	—
FS	Sanders, Mineral	Mount Bushnell	1790	43,070	—
FS	Sanders, Mineral	Cherry Peak	1791	39,640	—
FS	Mineral	Gilt Edge-Silver Creek	1792	11,200	—
FS	Sanders	Patricks Knob-N. Cutoff	1794	17,200	—
FS	Sanders	South Siegel-S. Cutoff	1795	14,800	—
FS	Sanders	North Siegel	1796	10,000	—
FS	Mineral	Marble Point	1798	13,170	—
FS	Mineral	Sheep Mtn.-St. Line	1799	40,500	—
FS	Missoula	Stark Mtn.	1800	14,140	—
FS	Missoula	Burdette	1803	16,380	—
FS	Missoula, Ravalli	Lolo Creek	1805	15,247	—
FS	Granite	Welcome Creek	1806	1,100	—
FS	Granite	Quigg	1807	81,985	60,830
FS	Missoula	Garden Point	1809	6,500	—
FS	Park, Sweetgrass, Stillwater	North Absaroka	1371	181,759	—
FS	Meagher, Park	Crazy Mtns.	1541	87,100	—
FS	Gallatin	Bridger Mtns.	1543	45,402	—
FS	Park	Republic Mtn.	1545	700	500
FS	Park	Chico Peak	1547	10,855	—
FS	Gallatin	Gallatin Divide-Hyalite	1548	158,109	—
FS	Gallatin	Dry Canyon	1550	2,160	—
FS	Park	Beartooth	1912	5,900	—
FS	Park	Reef	1914	2,200	—
FS	Park	Lionhead	1963	32,780	22,800
FS	Lewis & Clark, Broadwater	Hedges Mtn. & Middleman Mtn.	X1613 & 1612	32,865	—
FS	Lewis & Clark, Broadwater	Hellgate Gulch	X1614	18,196	—
FS	Lewis & Clark, Broadwater, Meagher	Cayuse Mtn.	X1615	18,550	—
FS	Lewis & Clark, Powell	Lincoln Gulch	1601	8,125	—
FS	Lewis & Clark	Anaconda Hill	1602	17,461	—
FS	Lewis & Clark	Specimen Creek	1603	11,281	—
FS	Lewis & Clark	Crater Mtn.	1604	8,991	—
FS	Lewis & Clark, Powell	Ogden Mtn.	1605	12,140	—
FS	Lewis & Clark, Powell	Nevada Mtn.	1606	49,530	—
FS	Lewis & Clark, Powell	Jericho Mtn.	1607	8,968	—
FS	Lewis & Clark	Lazyman Gulch	1608	11,928	—
FS	Powell, Jefferson	Electric Peak	1609	46,497	—
FS	Lewis & Clark	Gates of the Mtns.	1610	11,717	9,974
FS	Lewis & Clark	Devils Tower	1611	7,018	—
FS	Broadwater, Meagher	Camas Creek	1616	28,286	—
FS	Broadwater, Meagher	Mount Baldy	1617	16,114	—
FS	Broadwater, Meagher	Grassy Mtn.	1618	6,444	—
FS	Meagher	Ellis Canyon	1619	8,636	—
FS	Broadwater, Meagher	Irish Gulch	1621	7,330	—
FS	Carbon	Lost Water Canyon	1362	9,800	9,800
FS	Carbon	Red Lodge Creek-Hellroaring	1363	14,760	—
FS	Carbon	Burnt Mtn.	1364	9,320	—
FS	Carbon, Stillwater	Fishtail-Saddleback Mtn.	1366	16,560	—
FS	Stillwater-Sweetgrass	West of Woodbine	1369	2,000	—
FS	Carbon	Black Butte	1368	880	—
FS	Powder River	Cook Mtn.	1370	11,700	—
FS	Rosebud	King Mtn.	1372	11,700	—

Table P-2 Cont.

Agency	County(s)	Unit Name	Unit Number	Net Unit Acreage	Acres Recommended
FS	Carbon	Line Cr. Plateau	1911	20,680	—
FS	Carbon	Rock Creek	1913	200	—
FS	Lewis & Clark	Sawtooth	1721	15,500	—
FS	Cascade, Meagher	Tenderfoot-Deep Creek	1726	88,400	—
FS	Cascade	Pilgrim Creek	1727	49,500	—
FS	Cascade, Judith Basin	Paine Gulch	1728	8,500	—
FS	Cascade	Sawmill Creek	1729	12,800	—
FS	Judith Basin	TW Mtn.	1730	8,500	—
FS	Judith Basin, Cascade	Big Baldy	1731	44,000	—
FS	Judith Basin	Granite Mtn.	1732	10,580	—
FS	Judith Basin	Tollgate-Sheep	1733	26,800	—
FS	Judith Basin	Mount High	1735	32,300	—
FS	Choteau, Cascade, Judith Basin	Highwood-Baldy	1737	15,600	—
FS	Choteau, Judith Basin	Highwoods	1738	24,100	—
FS	Meagher, Wheatland	Bluff Mtn.	1740	37,120	—
FS	Meagher	Spring Creek	1741	19,800	—
FS	Meagher	Box Canyon	1742	11,647	—
FS	Meagher	Castle Mtns.	1743	29,600	—
FS	Meagher	North Fork of Smith	1744	8,800	—
FS	Meagher	Calf Creek	1745	11,020	—
FS	Meagher	Eagle Park	1746	6,300	—
FS	Beaverhead	Beaver Lake	X1003	13,474	—
FS	Beaverhead	Saginaw Creek	X1004	8,493	—
FS	Beaverhead	Tash Peak	X1005	62,119	—
FS	Beaverhead	West Pioneers	X1006	90,750	—
FS	Beaverhead	Call Mtn.	X1009	10,179	—
FS	Beaverhead	Cattle Gulch Ridge	X1010	18,891	—
FS	Beaverhead	Fleecer	X1011	36,873	—
FS	Deer Lodge, Beaverhead	Granulated Mtn.	X1012	16,266	—
FS	Beaverhead	Bear Creek	X1015	8,252	—
FS	Beaverhead	Mckenzie Canyon	X1016	33,652	—
FS	Beaverhead	Sourdough Peak	X1017	14,838	—
FS	Beaverhead	Timber Butte	X1018	5,018	—
FS	Beaverhead	Dixon Mtn.	X1019	3,982	—
FS	Beaverhead	Four Eyes Canyon	X1020	6,856	—
FS	Madison	Sheep Mtn.	X1021	32,115	—
FS	Madison	Crockett Lakes	X1022	6,830	—
FS	Madison	Cherry Lakes	X1023	12,940	—
FS	Madison	Vigilante	X1024	16,458	—
FS	Madison, Beaverhead	Snowcrest Mtn.	X1025	97,630	—
FS	Madison	Black Butte	X1026	39,787	—
FS	Madison	Big Horn Mtn.	X1027	50,390	—
FS	Madison	Lone Butte	X1028	14,138	—
FS	Madison, Beaverhead	Freezeout Mtn.	X1029	95,098	—
FS	Beaverhead	Anderson Mtn.	X1942	48,451	—
FS	Beaverhead	Goat Mtn.	X1944	9,454	—
FS	Deer Lodge, Beaverhead	North Big Hole	1001	56,779	6,571

Agency	County(s)	Unit Name	Unit Number	Net Unit Acreage	Acres Recommended
FS	Beaverhead	East Pioneer	1008	144,558	80,273
FS	Madison	Middle Mtn.-Tobacco	1013	93,327	—
FS	Madison	Roots	1014	5,465	—
FS	Beaverhead	Potosi	1943	130,660	55,014
FS	Beaverhead	West Big Hole	1945	90,917	12,907
FS	Beaverhead	Italian Peak	1961	42,777	—
FS	Beaverhead	Garfield Mtn.	1962	4,474	—
	TOTAL FS	Mt. Jefferson			
		NUMBER OF AREAS 180		5,611,789 ACRES	691,617 ACRES
NPS	NPS	Big Horn Canyon	—	7,645	—
	TOTAL NPS	NUMBER OF AREAS 1		7,645 ACRES	—

"X" before the unit number indicates a new roadless area that was identified through the forest planning process, not through RARE II.

TABLE P-3

WILDERNESS RECOMMENDATIONS TRANSMITTED BY THIS REPORT

District	Resource Area	Plan Name	Unit Name	Unit Number	Total Acreage	Acres Recommended
Butte	Garnet	Garnet RA Resource Management Plan/EIS	Wales Creek	MT-074-150	11,580	—
Butte	Garnet	Garnet RA Resource Management Plan/EIS	Hoodoo Mtn.	MT-074-151A	11,380	—
Butte	Garnet	Garnet RA Resource Management Plan/EIS	Gallagher Creek	MT-074-151B	4,257	—
Butte	Garnet	Garnet RA Resource Management Plan/EIS	Quigg West	MT-074-155	520	520
	TOTAL BLM		NUMBER OF AREAS 4		27,737 ACRES	520 ACRES

TABLE P-4

COMPLETED MONTANA BLM WILDERNESS STUDIES AWAITING PRESIDENTIAL RECOMMENDATIONS

District	Resource Area	Plan Name	Unit Name	Unit Number	Total Acreage	Preliminary Recommendations (State Director)
Butte	Headwaters	Humbug Spires ISA Suitability Report/ EIS	Humbug Spires	—	11,175	8,791 ac. suitable 2,384 ac. unsuitable
Butte	Headwaters	Headwaters RA Resource Management Plan/EIS	Blind Horse Creek	MT-075-102	4,927	4,927 ac. nonsuitable
Butte	Headwaters	Headwaters RA Resource Management Plan/EIS	Chute Mtn.	MT-075-105	3,205	3,205 ac. nonsuitable
Butte	Headwaters	Headwaters RA Resource Management Plan/EIS	Deep Cr./Battle Cr.	MT-075-106	3,086	3,086 ac. nonsuitable
Butte	Headwaters	Wilderness Planning Amendment/EIS for the Headwaters RA	Black Sage	MT-075-115	5,926	5,926 ac. nonsuitable
Butte	Headwaters	Wilderness Planning Amendment/EIS for the Headwaters RA	Yellowstone River Island	MT-075-133	53	53 ac. nonsuitable
Miles City	Billings	Billings RA Resource Management Plan/EIS	Twin Coulee	MT-067-212	6,870	6,870 ac. nonsuitable
Miles City	Billings	Billings RA Resource Management Plan/EIS	Pryor Mountain	MT-067-206	16,927	16,927 ac. suitable
Miles City	Billings	Billings RA Resource Management Plan/EIS	Burnt Timber Canyon	MT-067-205	3,955	3,430 ac. suitable 525 ac. nonsuitable
Miles City	Billings	Billings RA Resource Management Plan/EIS	Big Horn Tack-on	MT-067-207	4,550	2,550 ac. suitable 2,000 ac. nonsuitable
Butte	Dillon	Wilderness Planning Amendment/EIS for the Dillon RA	Ruby Mountains	MT-076-001	26,611	15,615 ac. suitable 10,996 ac. nonsuitable
Butte	Dillon	Wilderness Planning Amendment/EIS for the Dillon RA	Blacktail Mtns.	MT-076-002	17,479	10,986 ac. suitable 6,493 ac. nonsuitable
Butte	Dillon	Wilderness Planning Amendment/EIS for the Dillon RA	Farlin Creek	MT-076-034	1,139	610 ac. suitable 529 ac. nonsuitable
Butte	Dillon	Wilderness Planning Amendment/EIS for the Dillon RA	E. Fork Blacktail Deer Cr.	MT-076-007	6,180	6,180 ac. nonsuitable
Butte	Dillon	Wilderness Planning Amendment/EIS for the Dillon RA	Hidden Pasture Creek	MT-076-022	15,475	15,475 ac. nonsuitable
Butte	Dillon	Wilderness Planning Amendment/EIS for the Dillon RA	Bell Limekiln Canyons	MT-076-026	9,588	9,588 ac. nonsuitable

District	Resource Area	Plan Name	Unit Name	Unit Number	Total Acreage	Preliminary Recommnedations (State Director)
Butte	Dillon	Wilderness Planning Amendment/EIS for the Dillon RA	Henneberry Ridge	MT-076-028	9,756	9,756 ac. nonsuitable
Butte	Dillon	Wilderness Planning Amendment/EIS for the Dillon RA	Axolotl Lakes	MT-076-069	6,578	6,578 ac. nonsuitable
Lewis town	Phillips	Missouri Breaks Wilderness Suitability Study/EIS	Cow Creek	MT-066-256	34,050	21,590 ac. suitable 12,460 ac. nonsuitable
Lewis town	Phillips	Missouri Breaks Wilderness Suitability Study/EIS	Antelope Creek	MT-066-266	9,600	9,600 ac. suitable
Lewis town	Valley	Missouri Breaks Wilderness Suitability Study/EIS	Burnt Lodge	MT-065-278	13,730	13,730 ac. suitable
Miles City	Big Dry	Missouri Breaks Wilderness Suitability Study/EIS	Seven Blackfoot	MT-024-657	20,250	5,710 ac. suitable 14,540 ac. nonsuitable
Miles City	Powder River	Missouri Breaks Wilderness Suitability Study/EIS	Terry Badlands	MT-024-684	43,165	29,020 ac. suitable 14,145 ac. nonsuitable
Lewis town	Judith	Missouri Breaks Wilderness Suitability Study/EIS	Woodhawk	MT-068-246	8,100	8,100 ac. nonsuitable
Lewis town	Havre	Missouri Breaks Wilderness Suitability Study/EIS	Ervin Ridge	MT-066-253	10,200	10,200 ac. nonsuitable
Miles City	Big Dry	Missouri Breaks Wilderness Suitability Study/EIS	Bridge Coulee	MT-024-675	5,900	5,900 ac. nonsuitable
Miles City	Big Dry	Missouri Breaks Wilderness Suitability Study/EIS	Musselshell Breaks	MT-024-677	8,650	8,650 ac. nonsuitable
Lewis town	Valley	Bitter Creek Wilderness Suitability Study/EIS	Bitter Creek	MT-064-356	59,660	59,660 ac. nonsuitable
Miles City	Powder River	Powder River Resource Management Plan/EIS	Zook Creek	MT-027-701	8,438	8,438 ac. nonsuitable
Miles City	Powder River	Powder River Resource Management Plan/EIS	Buffalo Creek	MT-027-702	5,650	5,650 ac. nonsuitable
TOTAL BLM		NUMBER OF AREAS 30			380,875 ACRES	138,559 ACRES SUITABLE

TABLE P-5

MONTANA WILDERNESS RECOMMENDATIONS PENDING BEFORE CONGRESS (ALL AGENCIES)

Agency	County(s)	Unit Name	Unit Number	Unit Acreage
FWS	Garfield	East Seven Blackfoot	FW-923-1	12,184
FWS	Phillips	Mickey Butte	FW-923-2	17,413
FWS	Phillips, Valley	Burnt Lodge	FW-923-3	22,976
FWS	Garfield	Billy Creek	FW-923-4	11,556
FWS	Garfield	West Seven Blackfoot	FW-923-5	7,096
FWS	Phillips	Antelope Creek	FW-923-6	5,382
FWS	Garfield	West Mill Creek	FW-923-7	11,896
FWS	Petroleum	Fort Musselshell	FW-923-8	8,303
FWS	Garfield	Sheep Creek	FW-923-9	12,424
FWS	Phillips	West Beauchamp	FW-923-10	6,736
FWS	Garfield	Wagon Coulee	FW-923-11	10,528
FWS	Petroleum	Alkali Creek	FW-923-12	6,592
FWS	Petroleum	Crooked Creek	FW-923-13	6,842
FWS	Garfield	East Hell Creek	FW-923-14	15,984
FWS	Garfield	East Beauchamp	FW-923-15	5,568
	TOTAL FWS	NUMBER OF AREAS 15		161,480 ACRES
NPS	Flathead, Glacier	Glacier	NP-915	917,600
NPS	Park, Gallatin	Yellowstone	NP-928	167,060
	TOTAL NPS	NUMBER OF AREAS 2		1,084,660 ACRES

TABLE P-6

MONTANA STATUTORY WILDERNESS (ALL AGENCIES)

Agency	County(s)	Unit Name	Unit Number	Unit Acreage
BLM[1]	Madison	Bear Trap Canyon	—	6,000
	TOTAL BLM	NUMBER OF AREAS 1		6,000 ACRES
FS	Carbon, Stillwater, Sweet Grass, Park	Absaroka-Beartooth	NF 106	920,377
FS	Granite, Ravalli, Deer Lodge, Beaverhead	Anaconda-Pintlar	NF 003	157,874
FS	Flathead, Teton, Lewis & Clark, Powell	Bob Marshall	NF 005	1,009,356
FS	Lincoln, Sanders	Cabinets	NF 010	94,272
FS	Lewis & Clark	Gates of the Mtns.	NF 027	28,562
FS	Flathead Lake	Great Bear	NF 107	286,700
FS	Missoula	Mission Mtns.	NF 050	73,877
FS	Missoula	Rattlesnake	1-801	20,119
FS	Lewis & Clark, Powell	Scapegoat	NF 073	239,296
FS	Ravalli	Selway-Bitterroot	NF 074	248,893
FS	Granite	Welcome Creek	NF 103	28,135
FS[1]	Madison	Lee Metcalf	—	226,133
	TOTAL FS	NUMBER OF AREAS 12		3,333,594 ACRES
FWS	Beaverhead	Red Rock Lakes	WR-036	32,350
FWS	Sheridan	Medicine Lake National Wildlife Refuge	WR-027	11,800
FWS	Phillips	UL Bend National Wildlife Refuge	WR-047	20,847
	TOTAL FWS	NUMBER OF AREAS 3		64,997 ACRES
NPS	N/A	N/A	N/A	N/A
State Administered	N/A	N/A	N/A	N/A

[1] The 6,000-acre BLM-managed Bear Trap Canyon is one component of the 232,133-acre Lee Metcalf Wilderness. The other units in the wilderness are managed by the Forest Service.

APPENDIX Q
ECOSYSTEM REPRESENTATION

(See page 301 of the draft Resource Management Plan and Environmental Impact Statement.)

APPENDIX R
ANALYSIS OF RANCH BUDGETS

(See pages 302 to 308 of the draft Resource Management Plan and Environmental Impact Statement.)

APPENDIX S
COORDINATING ELK AND TIMBER MANAGEMENT RECOMMENDATIONS FROM THE FINAL REPORT OF THE MONTANA COOPERATIVE ELK LOGGING STUDY 1970-1985

(See pages 309 to 314 of the draft Resource Management Plan and Environmental Impact Statement.)

APPENDIX T
ERRATA FOR CHANGES TO DRAFT RMP/EIS

Table T-1 lists the changes to the draft RMP/EIS. These changes have been made in response to agency review.

Section	Page Number	Location	Change
Chapter 2	26, 33, 34, 40, 42	Special Attention Resources, first paragraph, last sentence	The sentence should read, "WSA boundaries and alternative wilderness recommendations are displayed on the individual **WSA Alternatives** maps."
	27, 35, 40	Recreation, Cultural, and Aesthetic Resources, first paragraph, third sentence	The sentence should read, "About 9,440 acres in the Ram Mountain, Chamberlain Creek **and Karshaw Mountain** areas are roaded, but would not be available for motorized recreation."
Chapter 2, Appendix O	28, 37, 235, 258	T13N, R13W, Sec. 5, 17	All maps of the Wales Creek WSA should be changed to correctly spell: **Chamberlain** and N. **Fork Elk Creeks.**
	29, 38, 236, 264	T12N, R10W, Sec. 26, 27, 32	All maps of the Hoodoo Mountain WSA incorrectly portray a Mac Mtn. which should be deleted. Also the maps should correctly spell: W. **Fork** Indian and E. **Fork** Indian Creeks.
	30, 39, 237, 268	T12N, R10W, Sec. 26, 27	All maps of the Gallagher Creek WSA should show the correct spelling of: W. **Fork** Indian and E. **Fork** Indian Creeks. Also "R8W" should be **R10W**.
	30, 39, 237, 268	Maps	All maps of the Gallagher Creek WSA incorrectly portray foot trails as vehicle roads or ways.
	31, 238	T7N, R16W, Sec. 7, 8, 17	The maps of the Quigg West WSA should portray the location of the Rock Creek Road as east of Rock Creek between Windless and Sheep Gulches.
Chapter 2, 4	53, 111	Tables 2-17 and 4-3, Alternative C column, Range heading	Change the 15th term "in" to **to.**
Chapter 2	59	Recreation, Cultural, and Aesthetic Resources (Management Direction), first paragraph, last sentence	The sentence should read, "Quigg West, the Limestone Cliffs, **Ram Mountain and Karshaw Mountain** would be closed to motorized vehicle use."
	59	Recreation, Cultural, and Aesthetic Resources (Rationale), first paragraph, fourth sentence	The sentence should read, "Quigg West, the Limestone Cliffs, **Ram Mountain** and **Karshaw Mountain** will be closed to vehicle access to protect unique resource values."
	62	Table 3-1, column 1	Change "Belt Series Rock" to Belt **Supergroup** Rock.
	63	fourth paragraph, first sentence	Change "Belt series rock" to Belt **supergroup** rock.

Chapter 3	71	Table 3-4, Energy/Mineral column, list of Industrial Minerals	Change "phosphote" to **phosphate**.
	71	first word of the narrative	Change "flouorite" to **fluorite**.
	71	second paragraph, second sentence	Delete the word "Limestone".
	76	Garnet Ghost Town, second paragraph, last sentence	Change "1960" to **1969**.
	77	General Recreation Areas, second subheading	Change title to "Hiking, Horseback Riding, **Cross Country Skiing**, and Off Road Vehicle Trails."
	77	Visual Resources, fourth paragraph, second sentence	Add the word **while** between the word phrases "Helmville/Avon Road" and "Garnet."
	78	Table 3-9, Road Closure Dates for Marcum Mtn. Special Management Area	Change dates to read, **Sept. 1 — Nov. 30 on private and BLM; Sept. 1 — Apr. 30 on BLM along Blackfoot Canyon face**.
	80	Wilderness Opportunities, third paragraph, first sentence	Change to read, "About 7 percent of the acreage still being studied in **Montana** is on BLM-administered land."
Chapter 3, Appendix O	82, 89, 270	Table 3-14, Quigg West, first sentence	The Quigg (Slide Rock) RARE II wilderness study area is variously identified by Q1-807 and Q1807. The correct identification number is **1807**.
Chapter 3	92	Reforestation, last paragraph, last sentence	Change "is indicated" to **may be included**.
	93	Livestock Grazing, first paragraph, second sentence	The sentence should read, "**Most** allotments are cow/calf operations."
	96	first sentence	Change the word "supports" to **provides**.
	102	Energy and Minerals, second sentence	Delete the phrase "a large silver mine;"
Chapter 4	114	Locables, first paragraph, between third and fourth sentences	Add the sentence, **However actual disturbance covers significantly fewer acres**.
	114	Salables, first paragraph, first sentence	Delete the word "valid."
	117	second column, second paragraph, first sentence	add the following words to the end of the sentence, **except for snowmobile use**.
	119, 129, 140, 155	Figures 4-1, 4-2, 4-3, 4-4, legend	Change to show the box containing the heavier, darker dots is the alternative and the box containing the lighter dots represents the current situation.
	120	second column, second paragraph, last sentence	Change "balnce" to **balance**.
	120, 130, 141, 156	Mountain Coniferous Habitat; Alternative A, fourth sentence; other alternatives, fifth sentence	Change to read, "Potential impacts include reduced fall security **areas** for big game;"
	124	first paragraph, second sentence	Delete the phrase "as compared to 1,800 acres in Alternative A."

124	Impacts on Soil and Water Resources, third paragraph, first sentence	Change "37" to **35**.
125	Salables, first paragraph, second sentence	Delete the word "valid".
127	Impacts on Visual Resources Management, second paragraph, first sentence	Delete the words "Significant negative impacts." Change to, "Maximizing timber production would require road and cutting units in foreground and middle ground viewing areas along the Clark Fork River, Blackfoot **River and Rock Creek corridors, as well as the Anaconda/Pintlar scenic route."** Add, **Because of the high traffic volumes in these scenic corridors, disturbance of vegetation and soils would be highly visible and result in significant negative impacts.**
128	Impacts on Range Resources, first paragraph, second sentence	Change sentence to read, "In the long term, AUMs available for livestock grazing would increase by **27 percent or 2,451 AUMs to a total of 11,662 AUMs.**"
130	second column, first sentence	Change "100" to **99**.
133	Table 4-7	Add a footnote, **The size classes are defined in Appendix R.**
135	Impacts on Soil and Water Resources, second paragraph, second sentence	Change "5,935" to **5,930**.
135	Impacts on Soil and Water Resources, third paragraph, first sentence	Change "8" to **6**.
135	Oil and Gas, second paragraph, second sentence	Change sentence to read, "Seasonal restrictions are located in existing and potential road closure areas **and big game winter range.**"
136	Table 4-8	Change the "520" acres of low geothermal potential outside wilderness to **O** and the "O" acres of low geothermal potential in Quigg West to **520**.

137	Salables, first sentence	Delete the word "valid."
138	first column, second paragraph	Change "1,600" to **1,700**.
138	Impacts on Wilderness Resources, first paragraph, second sentence	Change the second listing of the word "claims" to **leases**.
138	Impacts on Wilderness Resources, second paragraph, first sentence	Add the word **additional** after the word "management," and before the word "livestock."
139	Impacts on Range Resources, first sentence	Change "65" to **61**.
139	Impacts on Range Resources, second paragraph, first sentence	Change the sentence to read, "In the long term, the AUMs available for livestock grazing are projected to be 4,232 which is an increase of 637 AUMs (18 percent **over the 3,595 AUMs**).
139	Impacts on Range Resources, second paragraph	Add (**See Table 4-9**) to the end of the paragraph.
145	Impacts on Air Quality, third sentence	Change "513" to **14,350**.
145	Impacts on Soil and Water Resources, third paragraph, first sentence	Change "8" to **6**.
145	second column, second paragraph, first sentence	Delete the words, "Increased and acres available for oil and gas leasing and." Capitalize the "t" in "the".
146	Conclusion, second paragraph	Change the sentence to read, "Designation of a 20-acre ACEC would **support a request for withdrawal** from mineral entry, although this would not prove to be significant."
150	Impacts on Air Quality, third sentence	Change "9,237" to **520** and change the first listing of "greater" to **less**.
150	Impacts on Soil and Water Resources, first sentence	Change "9,237" to **520** and change the first listing of "greater" to **less**.
150	Impacts on Soil and Water Resources, second sentence	Change the words "a greater" to **less**.
150	Impacts on Soil and Water Resources, third paragraph, first sentence	Change the sentence to read, "Forest management activities will produce **a 10** percent increase in timber **harvested** for Alternative E as compared to Alternative A."
150	second column, second paragraph, first sentence	Change "leasing" to **lease surface occupancy**.
150	Oil and Gas, first sentence	Change "public lands" to **federal estate**.
151	Salables, first sentence	Delete the word "valid".
152	Impacts on Recreation Resources, fourth paragraph, first sentence	Change the second listing of "less" to **more**.
153	first column, third sentence	Change "leasing" to **lease surface occupancy**.

	153	Impacts on Visual Resource Management, fifth paragraph, second sentence	Change sentence to read, "**More** acreage is closed **but less is** limited by stipulations prohibiting surface occupancy than is specified under Alternative A."
	153	second column, Conclusions, third sentence	Change "leasing" to **lease surface occupancy**.
	154	Table 4-13, Percent column	Change "14" to **15**.
	156	first column, third paragraph, second sentence	Add (except waste land) between "grazing" and "should."
	156	second column, fourth paragraph, fourth sentence	Change "acresa" to **acres**.
	159	first column, first paragraph, first sentence	Change "increase" to **decrease slightly**.
Chapter 6	165	Soils and Watershed, second sentence	Change "MA" to **MS**.
Appendix B	181	Road System, first sentence	Change the words "the area" to **an**.
	181	Silvicultural heading	Change "SILVICULTURAL" to **LOGGING PRACTICES**.
Appendix D	189	first sentence	Change "by" to **but**.
	189	Figure D-1, middle	Change sentence to read: Number of Mining Claims Involved.
	194	Number 3, second sentence	Change "soparate" to **separate**.
Appendix F	203	Range Management, third paragraph	Change paragraph to read, "Fence posts shall be natural in color with no white tops **(can be changed to green or red posts with white tops where wildlife conflicts occur)**. Fences should follow natural breaks in vegetation and avoid straight lines."
	203	Roads, second sentence	Delete entire sentence.
	204	Roads	Change sentence to read, "Roads should be partially concealed by vegetation and follow natural landforms. **Cuts and fills should** be seeded as soon as possible.
Appendix G	207	Procedures, third paragraph, first sentence	Change "unrecorded" to **uninventoried**.
Appendix H	209	Table H-2, third column	Change heading to read: Total **BLM** Acres.
	209	Table H-2, fifth column	Change heading to read: Total **BLM** AUMs.
	210	top of page	Add **Table H-1**.
	210	Allotment 7116	Change "Lindberg" to **Lindbergh**.
	210	Allotment 7123	Change "Lindberg" to **Lindbergh**.
	212	Allotment 7225	Change "Holers" to **Wohlers**.
	212	Allotment 7305	Change "Gilles" to **Gillies**.
	212	Allotment 7325	Change "Klobeck" to **Kolbeck**.

	212	Allotment 7501	Change "McGillvary" to **McGillvray**.
	212	Allotment 7505	Change "Deleo" to **DeLeo**.
	212	Allotment 7506	Change "Rierson" to **Reierson**.
Appendix I	216	Allotment 7506	Change "Rierson" to **Reierson**.
Appendix L	220	third heading	Change heading to read, "Vegetative Condition **and Trend**."
	220	Vegetative Condition and Trend	Add a fourth paragraph to read, **The trend has been one of static or improving range conditions on all of the 10 existing AMPs**.
	222	Table L-2, Allotment 7123	Change "Lindberg" to **Lindbergh**.
	222	Table L-2, Allotment 7323	Change Acres (BLM only) from "1,342" to **454** and Unclassified from "888" to **0**.
	222	Allotment 7211	Change "Gravely" to **Graveley**.
	224	Allotment 7506	Change "Rierson" to **Reierson**.
Appendix M	226	above the table name	Add the heading **Table M-1**.
	228	above the table name	Add the heading **Table M-2**.
	228	Total Cost X $1000 column	Add footnote to read "$1000[1]."
	228	bottom of Table M-2	[1] **The totals in this column are cumulative discounted costs.**
Appendix N	231	Table N-1, Ranch Size Category column	Add a footnote to read "Category *"; at the bottom of the table add, **Defined in Appendix R**.
Appendix O	233	title of Appendix O	Change "STUDIES" to **STUDIED**.
	234	WSA locations	Change "Gallagher Mtn" to **Wales Creek** and "Wales Creek" to **Gallagher Creek**.
	243	Gallagher Creek, second sentence	Delete the phrase, "and optimal use of the range resources."
	245	Alternative E, Timber Harvest, second sentence	Change sentence to read, **Timber harvest on 19,617 acres will be consistent with wildlife habitat management objectives**.
	248	Alternative A, Wilderness	Change "11,500" to **11,580**.
	248	Visual and Forest Resources	Add a line across the page to divide these two issues.
	248	Alternative A, Range, second sentence	Change the location of the sentence to the Wildlife and Fisheries row of Alternative A.
	248	Alternative A, Wildlife and Fisheries, second sentence	Change the location the the sentence to the Socioeconomic row of Alternative A.
	248	Alternative A, Socioeconomic	Change "11,380" to **11,580**.
	253	Range, Wildlife and Fisheries, Alternative C to E	Add a dividing line between the issues extending from page 252.
	253	Socioeconomic, Alternative E	Change "118" to **154**.
	257	Table 0-8	Change the table to read,

TABLE O-8

EFFECTS ON NATURALNESS
WALES CREEK WSA

Feature	Legal Location	Length/Area	Impact	Remarks
Wales Cr. Fire Rd.	T13N, R13W Sec. 12,14,15	Approx. 3.3 mi.	High	This road is a cherrystem entering the WSA
Yourname Cr. Rd.	T13N, R12W, Sec. 17,18; T13N, R13W, Sec. 13,22,23	Approx. 3.6 mi.	High	This road is a cherrystem entering the WSA
Vehicle Way off Elevation Mtn. Rd.	T13N, R13W, Sec. 21, NW¼	Approx. 1/2 mi.	Low	
	T13N, R13W, Sec. 28, N½	1/4 mi.	Low	
Vehicle Way off Wales Cr. Fire Rd.	T13N, R13W Sec. 14, SW¼	Approx. 125 yds.	Low	Leads to spring
Thinnings (2)	T13N, R13W, Sec. 21	Under 1 ac.	Low	Largely unnoticeable
Old fire line	T13N, R13W, Sec. 13,24	Approx. 1/2 mi.	Low	Visible from the air
Spur to cabin at head of Yourname	T13N, R13W, Sec. 22	1/8 mi.	Low	Leads to old mining operation
Old cabin	T13N, R13W, Sec. 22	Under 1 ac.	Low	Partially collapsed
Prospect hole (assoc. with old cabin)	T13N, R13W, Sec. 22	Under 1 ac.	Low	
Line fence	T13N, R13W, Sec. 25	Approx. 1/4 mi.		
Chamberlain Mtn. Rd.	T13N, R13W, Sec. 3,4	Approx. 1/4 mi.		Cherrystem for about 3/4 mi.

Section	Page Number	Location	Change
	259	Outstanding Opportunities, second sentence	Delete "larch,"
	260	Energy and Minerals, second sentence	Change sentence to read, "**Its** bedrock consists of a thick series of sedimentary rocks which are folded and faulted."
	260	Energy and Minerals, fourth sentence	Change sentence to read, "**Younger extrusive** volcanic rocks cover large parts of the WSA."
	261	Forest Resources, first paragraph, last sentence	Change "707" to **789**.
	265	Soil and Water Resources, fifth sentence	Add the phrase **within the WSA boundaries** between the words "creek" and "because".
	265	Energy and Minerals, first sentence	Delete the first 17 words and change the sentence to read, "The discussion of energy and minerals for **the Wales Creek** WSA is also applicable to Hoodoo Mountain with the exception that it has no unpatented mining claims."
	265	Energy and Minerals, second paragraph, second sentence	Change the sentence to read, "Much of the area is covered by **extrusive volcanics** which **make mineral** resource assessment difficult."
	266	Range Resources, fourth sentence	Change "186" to **184**.
	269	Energy and Minerals, first sentence	Delete the first 18 words and change the sentence to read, "The discussion of energy and minerals for the **Wales Creek** WSA is also applicable to Gallagher Creek with the exception that it has no unpatented mining claims."
	269	Energy ad Minerals, third sentence	Change "lava" to **extrusive volcanics**.
	270	Big Game Species, second sentence	Change "cover" to **areas**.
	270	Big Game Species, second paragraph, second sentence	Change "security habitat" to **hiding cover**.
	270	Social and Economic Conditions, first paragraph, last sentence	Change "bisecting" to **adjacent**.
	271	Energy and Minerals, first paragraph, last sentence	Delete entire sentence.
	273	Impacts on Wilderness Resources, second paragraph, first sentence	Change "10,683" to **10,850**.
	274	Impacts on Wildlife and Fisheries Resources, second sentence	Change "cover" to **areas**.
	275	Impacts on Wildlife and Fisheries Resources, second sentence	Change "cover" to **areas**.

	275, 283, 289	Impacts on Lands Program	Change "Restricting" to **Exclusion of**.
	276	Impacts on Wildlife and Fisheries Resources, first sentence	Change "cover" to **areas**.
	277	Impacts on Wildlife and Fisheries Resources, second paragraph, first sentence	Change "cover" to **areas**.
	278	Impacts on Range Resources, first sentence	Change "163" to **184**.
	278	Impacts on Range Resources, second sentence	Change "39" to **60**.
	279	Impacts on Socioeconomic Conditions, first sentence	Change "39" to **60**.
	281	Impacts on Wildlife and Fisheries Resources, second paragraph, first sentence	Change "cover" to **areas**.
	281	Impacts on Soil and Water Resources, first sentence	Delete the words "highly erosive granitic."
	282	Impacts on Soil and Water Resources, second sentence	Change sentence to read, "Special practices would be required to prevent erosion **of** soils."
	282	End of page	Add, **IMPACTS ON RECREATION RESOURCES** **There will be a decrease in opportunities for primitive recreation and an increase in motorized recreation on 4,257 acres.**
	283, 284	Impacts to Wildlife and Fisheries Resources, second sentence	Change "cover" to **areas**.
	285	Impacts on Wildlife and Fisheries Resources, first sentence	Change "cover" to **areas**.
	285	Impacts to Soil and Water Resources, first sentence	Change "3,257" to **1,000**.
	286	Impacts on Wildlife and Fisheries Resources, second paragraph, first sentence	Change "cover" to **areas**.
	288	Impacts on Wildife and Fisheries Resources, third sentence	Change "cover" to **areas**.
	289	Impacts on Wildlife and Fisheries Resources, second sentence	Change "cover" to **areas**.
Glossary	318	definition of Optimum Aquatic Habitat	Change "these" to **those**.

Map Packet	Allotment A (West Half)	T8N, R13W, Sec. 4, along Flint Creek	Change "MA11" to **MA1**.
		T12N, R16W, Sec. 8, along Ashby Creek	Change "MA1" to **MA7**.
		T12N, R13W, Sec. 34, Nevershine	Add **MA7** to unallocated area.
		T11N, R13W, Sec. 4, Sheep Gulch	Add a line across the top of the section to separate MA6 and MA3.
	Alternative B (East Half)	T14N, R10W, Sec. 30, SE¼SE¼NW¼	Add **MA3**.
	Alternative E (West Half)	T14N, R16W, Sec. 32, SE¼SE¼	Add **MA7**.
		T13N, R17W, Sec. 2, Lot 1	Delete "MA7".
	Motorized Recreation Restrictions (West Half)	T11N, R13W, Sec. 4, SE¼SE¼SE¼, Sec. 9, NE¼NE¼NE¼, Limestone Cliffs	Change the shade to brown to indicate the area is closed to motorized vehicle use except for the Rattler Gulch Road.
		T7N, R16W, Sec. 26	Change shade to brown to indicate the area is closed to motorized vehicle use.
		T6N, R15 and 16W, West Fork Buttes	Delete the designation "(E1)" as the cooperative road closure is no longer in effect.
	Motorized Recreation Restrictions (East Half)	T14N, R10 and 11W, Marcum Mtn.	Change the period of closure for the lands between road B1 and Highway 200 to **September 1 — April 30**.
	Land Adjustment Map (West Half)	T13N, R12W, Sec. 15, NE¼NE¼	Change the portion of Sec. 15 lying NE of the county road from "Retention" to **Other Lands**.
	Land Adjustment Map (East Half)	T10N, R8W, Sec. 13 Carpenter Creek	Change from "Retention" to **Other Lands**.
		T10N, R6W, Sec. 20, 21, 27, 28, Rich Spur	The public land ownership is incorrect, for change contact BLM Garnet Area Office.
	Surface Ownership (West Half)	T11N, R14W, Sec. 3, 10 Bear Gulch	The private land ownership is incorrect, for change contact BLM Garnet Area Office.
	Allotments (East Half)	Allotment 7219	Change "M" to **I**.
	Allotments (West Half)	Allotment 7101	Change "M" to **I**.
		Allotment 7109	Change "M" to **I**.
		Allotment 7311, 7323 Henderson and Smart Creeks	The lands shown in these allotments are incorrect, for changes contact BLM Garnet Area Office.

APPENDIX U

RESOURCE MONITORING AND EVALUATION PLAN

The resource monitoring and evaluation plan (Table U-1) lists the key resources that will be managed by the Garnet Resource Management Plan (RMP). For each resource there are a series of items that will be monitored. Each item is evaluated by location, technique for data gathering, unit of measure, and frequency and duration of data gathering. When duration is not specifically stated, the duration is for the life of the plan.

The monitoring and evaluation plan states the event that will signal an unacceptable impact to the resource. When such an event is noted, the management action associated with the event will be evaluated. If the adverse impact can be corrected by a management action that is within the scope of the RMP, the change will be implemented. If the adverse impact can be corrected only by a management action that is outside the scope of the RMP, the management change will be the subject of a formal RMP amendment.

TABLE U-1

Resource Monitoring and Evaluation Plan

Element	Item	Location	Technique[1]	Unit of Measure	Frequency and Duration	Info. Warranting a Decision Change
Vegetation	condition	all M&I allotments	as outlined in SCS National Range Handbook Section 305[2]	% pounds production compared to climax allowance	end of each grazing cycle	condition is reduced one class
	trend	a. all M&I allotments	canopy-coverage (Daubenmire),[3] soil surface	change in % of surface area	a. end of each grazing cycle	decrease of 10 percentage points from base data
		b. any allotment where adjustment in preference is proposed	factor (MSO-7100-1),[4] photos		b. first and fifth year, then on 5 yr. interval	
	cover	M&I allotments	canopy-coverage (Daubenmire),[3] photos	% of surface area	end of each grazing cycle	decrease of 10 percentage points from base data
	utilization	M&I allotments	key forage plant[5]	% forage removed	annually at end of grazng cycle	utilization more than 50% on native grasses
	precipitation	M&I allotments	site specific rain gauges, RAWs units,[6] NOAA data[7]	inches of precipitation	monthly during growing season	consider with temperature data to determine utilization level
	temperature	M&I allotments	NOAA data,[7] RAWs data[6]	degrees F or C	monthly during growing season	consider with precipitation data to determine utilization level

Appendix U

Element	Item	Location	Technique[1]	Unit of Measure	Frequency and Duration	Info. Warranting a Decision Change
Cultural Resources	site vandalism	area wide for sites eligible for nomination to the Register of Historic Places	site inspection	number of sites disturbed	once yearly during snowfree season	any noticeable trend indicating increased site disturbance such as ground disturbance, modification of structures, etc.
	environmental degradation, movement of artifacts as a result of erosion and trampling	area wide for sites eligible for nomination to the Register of Historic Places	site inspection and photo plot-measurement method using closeup photos and measurements to show quantitative changes in the distribution of artifacts	number of artifacts displaced or altered per square yard	once a year	any disturbance involving sites eligible for nomination to the Register of Historic Places
Commercial Forestland	stocking	all regenerated stands either natural or planted	stocking survey [8]	number of trees per acre	five year intervals until stand is declared established or until 15 yrs.	fewer than 180 trees per acre well distributed throughout the stand 15 years after harvest
	post harvest evaluation	cutting units	site inspection	resource characteristics	within one month after termination or as soon as area is snowfree	sale plan EA and stand prescription recommendations not met
	prethinning evaluation	all regenerated stands	stocking survey [8]	stand condition, trees/ acre	approximately 20 yrs. after stand has been declared established	crown competition is evident
	insect & disease survey	timber stands	aerial and ground observation by USDA Forest Pest Mgmt.	acres affected	annual	change in incidence and level of damage
	cover	all regenerated stands in MAs 4, 5, 6	site inspection	200 trees per acre 8 feet tall	begin 15 years after stand is declared established, continue at 5 yr. intervals until stand meets MA objectives	stand meets MA objectives, adjacent stands then become eligible for harvesting
	use	all authorized use areas i.e.timber sales, post & pole permits, etc.	site inspection	amount of use	minimum of once a week during logging and increased frequency as necessary during road building, slash disposal and reforestation; minimum once a month for post & poles	violation of contract specification

Element	Item	Location	Technique[1]	Unit of Measure	Frequency and Duration	Info. Warranting a Decision Change
	progeny test plantation (data collection)	Top-O-Deep	as required by IETIC [9]	standard quantitative measurements of survival, height, growth	every 5 yrs on tree growth	when data is no longer required or different data is required
	progeny test plantation (site protection)	Top-O-Deep	site inspection	trees showing pest damage	twice a yr.	increase in pest activity
Wilderness	wilderness study areas	MA 8	monitoring by flight or vehicle based review	site disturbance	once per month during use season or more often if evidence occurs to warrant disturbance	evidence of unauthorized activity which degrades wilderness values will instigate an investigation and possible civil or criminal court action
Recreation	general recreation use	area wide with emphasis on dispersed use of undeveloped recreational sites	area inspection to look for vandalism, resource abuse, etc.	visitor days	twice per year e.g. once in June and once in Oct.	collected data reveals user conflicts, resource degradation, or safety hazards
	concentrated recreation use and demand	Garnet, heavily used trail heads, and winter trails	visitor registration at Garnet, traffic counters, and estimates	visitor days	counters to be checked biweekly during periods of heavy use, daily counts or estimates of use at Garnet by BLM or Garnet Preservation Association	collected data indicates increased visitor use/yr. or sustained use that requires additional or improved facilities
	road closure	area wide with emphasis on designated walk-in hunting areas	aerial reconnaissance and ground patrol	visitor days and violations	one fall and one winter flight per year, ground patrol of gates twice during periods of heavy use or more often if evidence occurs to warrant observation	on any given road closure gate, three violations are noted/season

Appendix U

Element	Item	Location	Technique[1]	Unit of Measure	Frequency and Duration	Info. Warranting a Decision Change
Water	water quality	area wide where management activities are occurring or to expand base-line data	standard USGS methods (or modified to meet specific conditions), field and laboratory analysis [13] done for selected stream basins that have continuous discharge measurements during the period April thru September or runoff period; automated suspended sediment sampling and continuous temperature measurements will occur in selected streams during the period April thru October	standard quantitative measurements for discharge, turidity, conductivity, pH, suspended sediment, temperature, major ions, heavy metals, toxic materials	field measurements 10-15 times per year; major ions once a year; heavy metals and toxic substances as needed; base line data collected for five years prior to disturbance activities in basins without prior data; monitoring will continue throughout the activity period and for up to 4 years following completion of activities	water quality parameters which exceed state of Montana water quality standards; water quality measurements, especially suspended sediments, which render the water unsuitable for its classified usage
Soil & Site Productivity	compaction	Tertiary Age volcanic soils which will be and have been disturbed	use of Proving Ring Pentrometer	pounds per square inch	twice per year over a 5 year period	when compacted areas exceed 10% of ground surface and do not recover through natural process within 5 years
	soil moisture	selected fine-grained volcanic soils, course-grained plutonic soils, limestone soils, Belt Supergroup soils	manual sampling and gravimetric analysis	% by weight	once monthly June thru September	when regeneration is impaired due to inadequate soil moisture induced by silvicultural treatments
Threatened and Endangered Habitats	habitat use	bald eagle reproduction & wintering sites. Peregrine, grizzly bear and wolf-as identified by occurrence reports and recovery plans	bald eagle by aerial and/or field survey; other species by direct/indirect observation	number of sitings	bald eagle reproduction survey, 6 surveys mid-March thru July; winter roost and forage, 2-3 times from Dec. thru Feb.; other species when reported	1-3 yr. downward trend in production or occupancy
	habitat condition and trend	bald eagle MA 1, 2, 6, 12	Montana Bald Eagle Management Plan Survey levels [10]	number of occupied/ potential territories and roosts	once during base year and at 5-10 year intervals	1-3 yr. downward trend in suitable territory characteristics

Element	Item	Location	Technique[1]	Unit of Measure	Frequency and Duration	Info. Warranting a Decision Change
Nongame Habitat	use	raptor reproduction sites	nest site visitation and route surveys	number of birds or occupied nests	once annually prior, during and post resource activities	1-3 yr. downward trend in production or occupancy
Riparian Habitat	condition and trend	MA 1, 2, 9	photo plot, [12] cover board Daubenmire [3] aerial photo (IR)	% of total surface area, habitat characters	frequently while gathering 1 yr. data base for: AMP's with unsatisfactory riparian, improvement category allotments with unsatisfactory riparian and MA2 with planned timber harvest; read once per cycle in pastures with grazing system and once every 4 yrs. for allotments with no cycle ie. same every year; read prior and once every year for 5 yrs. after timber harvest; monitor present satisfactory riparian when management action occurs	either deterioration or no improvement is noted in habitat that is presently in unsatisfactory condition, deterioration is noted in habitat presently in satisfactory condition
Big Game Habitat	seasonal habitat use	MA 3, 4, 5, 6, 9, 13	aerial survey, FWP data, traditional use areas, telemetry, and pellet group indices	distribution of big game animals and use	at least once before, during and after other resource activities	objectives for big game habitat not being met (see MA Goals)
	habitat component use	MA 1, 2, 4, 5, 6, 9	direct/indirect observation, time lapse photography	frequency and duration of use by big game animals	once a year for a 2-year data base, after activity period	objectives for big game habitat not being met (see MA Goals)
	seasonal habitat and component condition and trend	MA 3, 4, 5, 6, 13	tree, shrub, grass/forb Daubenmire [3] cover board, densiometer, chip/weight, point center quarter, [11] production utilization, photo	% of annual growth and % change in vegetative structure and composition	each component at a 5 to 10 year interval for structural composition changes unless earlier alteration	objectives for big game habitat not being met (see MA Goals)

Element	Item	Location	Technique[1]	Unit of Measure	Frequency and Duration	Info. Warranting a Decision Change
Fisheries Habitat	use by native cutthroat, Dolly Varden, and other trout species	MAs 1, 2, and others where present	electro-shock, hook line, etc. as conducted by Montana Dept. of Fish, Wildlife and Parks	number and kind of fish per stream	to be coordinated with MDFWP information needs	a decline from the 3 yr. data base for native cutthroat
	habitat conditon and trend for native cutthroat, Dolly Varden, and other trout species	MAs 1, 2, and others where present	stream habitat analysis form 6671-5	average % miles on BLM, pool/riffle, bank cover, bank stability	data base then once each 5-10 yrs.; also, pre and post disturbance survey	decline in habitat condition and trend
Minerals	use	MA 14	site inspection to determine adherence to 3809 regulations and monitor effects on other resources	resource characteristics	minimum of biweekly during periods of operation and increased frequency during road building, etc.	violation of 3809 regulations, change from plan of operations or notice; unnecessary or undue degradation

[1] Monitoring activities between differing elements and within the same element will be conducted and/or coordinated so as to reduce duplications, travel time, etc. and thereby increase efficiency while reducing costs. The existing Studies Index System will also be used as a tool for tracking and scheduling monitoring plans.

[2] USDA. Soil Conservation Service. 1976. *National Range Handbook*. Washington D.C.

[3] Daubenmire. 1959. "A Canopy Coverage Method of Vegetational Analysis." *Northwest Science*. 33(1): 43-64.

[4] USDI. Bureau of Land Management. 1981. *BLM Manual*. Section 4430.5. Denver, CO.

[5] USDI. Bureau of Land Management. 1984. *Rangeland Monitoring: Utilization Studies*. Technical Reference 4400-3. Denver, CO.

[6] RAWS. Remote Automatic Weather Station operated by BLM.

[7] NOAA. National Oceanic and Atmospheric Administration.

[8] USDI. Bureau of Land Management. 1981. *BLM Manual*. Section 5705. Denver, CO and Butte District Policy Memo. April 12, 1982. "Reforestation Backlog Certification Standards-Manual Supplement."

[9] IETIC. Inland Empire Tree Improvement Cooperative.

[10] Montana Bald Eagle Working Group. 1983. *Montana Bald Eagle Management Plan* (draft). and Butte District Memo. July 25, 1984. "MBO Report-Bald Eagle." 68-40.3.

[11] Mueller. 1974. *Aims and Methods of Vegetation Ecology*. J. Wiley and and Sons. New York, NY.

[12] USDI. Fish and Wildlife Service. 1981. "Riparian Trend Station; Adoption of Vegetation Profile Board."

[13] USDI. Bureau of Land Management. 1980. "BLM-State of Montana Memorandum of Understanding."

GLOSSARY

(See pages 315 to 322 of the draft Resource Management Plan and Environmental Impact Statement, Chapter 8 for text changes, and Appendix T for Errata.)

REFERENCES

(See pages 323 to 324 of the draft Resource Management Plan and Environmental Impact Statement and Chapter 8 for text changes.)

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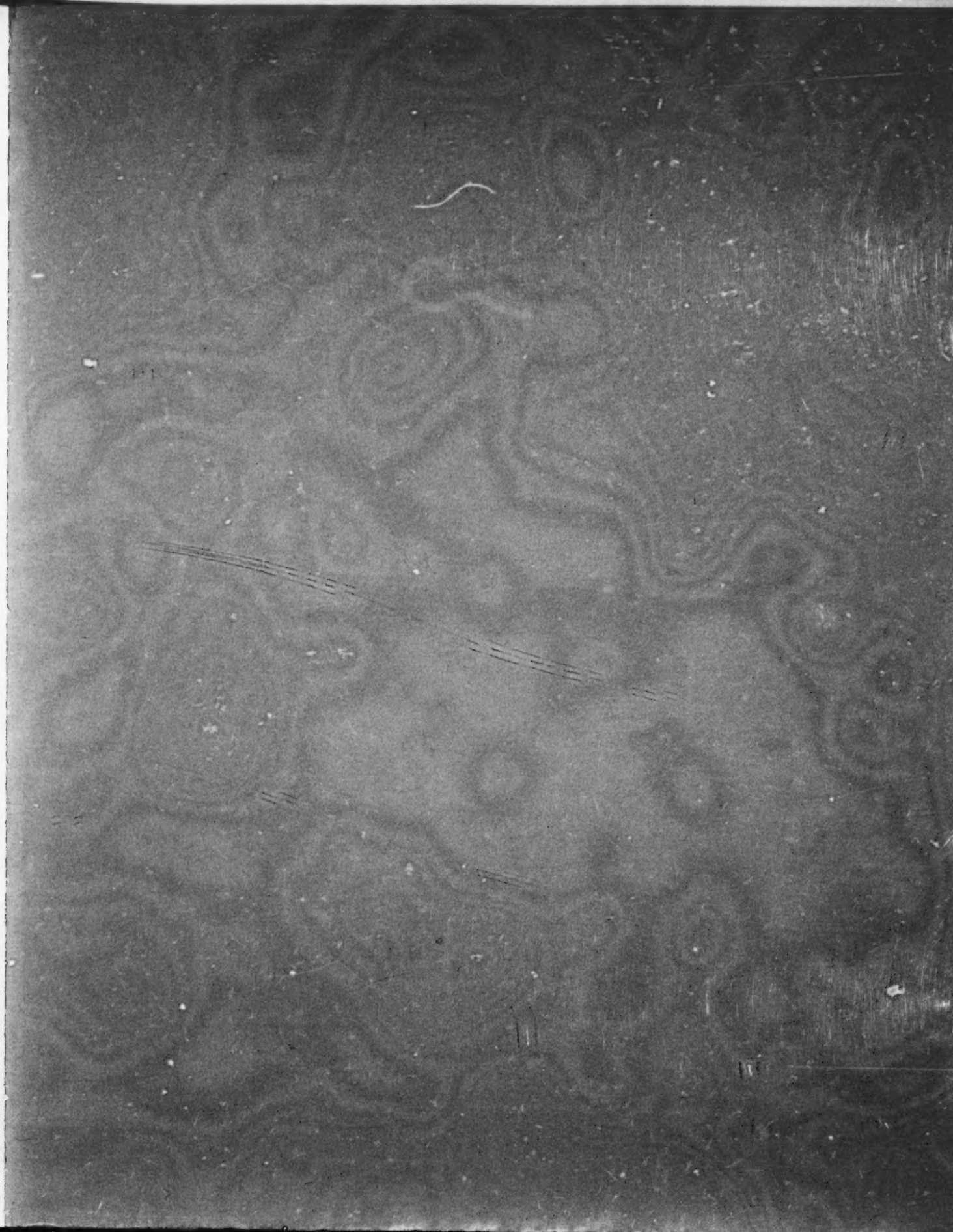
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